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FCC Record

A comprehensive compilation of decisions, reports, public notices and other documents of the Federal Communications Commission of the United States.

FEDERAL COMMUNICATIONS COMMISSION

Reed E. Hundt, Chairman
James H. Quello
Andrew C. Barrett
*Susan Ness
**Rachelle B. Chong

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*Commissioner Ness sworn in on June 3, 1994.
**Commissioner Chong sworn in on June 6, 1994.

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Federal Communications Commission Record

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Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No.416MS0022

Notice of Apparent Liability for Forfeiture
Penalty for Station KNKM777 in the Public
Land Mobile Service at Castle Dale, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 25, 1994

By the Chief, Mobile Services Division:

1. On January 24, 1991, the Commission granted an authorization to Emery Telephone (Emery) to operate on frequencies 454.250 Mhz and 454.400 MHz at Emery Telephone Castle Dale Central Office, 301 North "100" West, Castle Dale, Utah. The expiration date of the authorization was January 24, 1992. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 11, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states:

> *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have--
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on January 24, 1992, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures,* 8 FCC Rcd 6215 (1993), petition for review pending sub nom. USTA v. FCC, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

[1] Section 312(f)(1) of the Communications Act provides:

> The term "willful", when used with reference to the commission or omission of any act, means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act or by a treaty ratified by the United States.

This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.,* 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No.416ms0023

Notice of Apparent Liability for Forfeiture Penalty for Station KNKM779 in the Public Land Mobile Service at Orangeville, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 25, 1994

By the Chief, Mobile Services Division:

1. On January 24, 1991, the Commission granted an authorization to Emery Telephone (Emery) to operate relay facilities on frequencies 459.250 MHz, 459.400 MHz, 152.69 MHz, and 454.525 MHz at Horn Mountain Translator Site, North Horn Mountain Section 33, 4.5 miles Southeast of Joe's Valley Reservoir, Orangeville, Utah. The expiration date of the authorization was January 24, 1992. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 11, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states:

> *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have--
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on January 24, 1992, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures*, 8 FCC Rcd 6215 (1993), petition for review pending sub nom. USTA v. FCC, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

[1] Section 312(f)(1) of the Communications Act provides:

> The term "willful", when used with reference to the commission or omission of any act, means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act or by a treaty ratified by the United States.

This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.*, 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No.416ms0024

Notice of Apparent Liability for Forfeiture
Penalty for Station KNKO304 in the Public
Land Mobile Service at Ferron, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 25, 1994

By the Chief, Mobile Services Division:

1. On September 26, 1991, the Commission granted an authorization to Emery Telephone (Emery) to operate on frequency 152.78 MHz at Ferron Central Office, 300 North 300 West, Ferron, Utah. The expiration date of the authorization was September 26, 1992. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 10, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states:

> *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have--
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on September 26, 1992, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures*, 8 FCC Rcd 6215 (1993), petition for review pending sub nom. USTA v. FCC, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

---

[1] Section 312(f)(1) of the Communications Act provides:

> The term "willful", when used with reference to the commission or omission of any act, means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act or by a treaty ratified by the United States.

This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.*, 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No.416ms0025

Notice of Apparent Liability for Forfeiture
Penalty for Station KNKO306 in the Public
Land Mobile Service at Emery, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 25, 1994

By the Chief, Mobile Services Division:

1. On September 26, 1991, the Commission granted an authorization to Emery Telephone (Emery) to operate on frequencies 454.325 MHz and 454.275 MHz at 180 South Street, Emery, Utah. The expiration date of the authorization was September 26, 1992. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 10, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states: *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have--
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on September 26, 1992, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures,* 8 FCC Rcd 6215 (1993), petition for review pending sub nom. USTA v. FCC, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

[1] Section 312(f)(1) of the Communications Act provides:

> The term "willful", when used with reference to the commission or omission of any act, means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act or by a treaty ratified by the United States.

This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.,* 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No.416ms0026

Notice of Apparent Liability for Forfeiture
Penalty for Station KNKO307 in the Public
Land Mobile Service at Horn Mountain, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 25, 1994

By the Chief, Mobile Services Division:

1. On September 26, 1991, the Commission granted an authorization to Emery Telephone (Emery) to operate on frequencies 152.54 MHz and 152.66 MHz at Horn Mountain, Section 33, 4.5 miles Southeast of Joe's Valley, Utah. The expiration date of the authorization was September 26, 1992. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 10, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states:

> *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have--
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on September 26, 1992, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures,* 8 FCC Rcd 6215 (1993), petition for review pending sub nom. USTA v. FCC, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

[1] Section 312(f)(1) of the Communications Act provides:

> The term "willful", when used with reference to the commission or omission of any act, means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act or by a treaty ratified by the United States.

This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.,* 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No.416ms0027

Notice of Apparent Liability for Forfeiture
Penalty for Station KNKO767 in the Public
Land Mobile Service at Horn Mountain, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 26, 1994

By the Chief, Mobile Services Division:

1. On August 13, 1992, the Commission granted an authorization to Emery Telephone (Emery) to operate on frequencies 152.03 MHz, 152.15 MHz and 152.06 MHz at Horn Mountain, Section 33, 4.5 miles Southeast of Joe's Valley, Utah. The expiration date of the authorization was August 13, 1993. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 10, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states:

> *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have–
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on August 13, 1993, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures,* 8 FCC Rcd 6215 (1993), petition for review pending sub nom. USTA v. FCC, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

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This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.,* 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re

Emery Telephone File No. 416ms0028

Notice of Apparent Liability for Forfeiture
Penalty for Station KNKO786 in the Public
Land Mobile Service at Horn Mountain, Utah

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: July 13, 1994; Released: July 26, 1994

By the Chief, Mobile Services Division:

1. On September 15, 1992, the Commission granted an authorization to Emery Telephone (Emery) to operate on frequencies 454.075 MHz, 454.300 MHz and152.21 MHz at Horn Mountain, Section 33, 4.5 miles Southeast of Joe's Valley, Utah. The expiration date of the authorization was September 15, 1993. On January 3, 1994, Emery filed a request for Special Temporary Authority (STA) to continue operation while waiting for reinstatement due to letting the construction permit lapse. The STA was granted January 10, 1994.

2. Section 22.9(b)(1) of the Commission's Rules states:

> *Notification of status of facilities. (FCC Form 489).* When construction has been completed in accordance with the radio station authorization, the licensee shall so notify the Commission using Form 489. Licensees can commence service the day Form 489 is placed in the mail to the FCC.

Therefore, because Emery commenced operation without filing FCC Form 489 in a timely manner with the Commission, it is in apparent violation of Section 22.9(b)(1).

3. Section 503(b) of the Communications Act states in pertinent part:

> Any person who is determined by the Commission, in accordance with paragraph (3) or (4) of this subsection, to have--
>
> (B) willfully or repeatedly failed to comply with any of the provisions of this chapter or of any rule, regulation, or order issued by the Commission under this chapter... shall be liable to the United States for a forfeiture penalty.

We find that Emery's failure to file a Form 489 before or on September 15, 1993, constitutes willful conduct within the terms of the statute.[1] In its request for STA, Emery admits that the licenses were allowed to lapse.

4. Pursuant to the Commission's *1993 Policy Statement, Standards for Assessing Forfeitures*, 8 FCC Rcd 6215 (1993), *petition for review pending sub nom. USTA v. FCC*, No. 93-1526 (D.C. Cir. filed Aug. 23, 1993), the base forfeiture amount for failing to file required forms is $20,000. The forfeiture is being adjusted downward by $10,000 because failing to file an FCC Form 489 is a relatively minor violation, and by an additional $6,000 because Emery voluntarily disclosed its failure to file the FCC Form 489 in a timely manner. Consequently, a $4,000 forfeiture is assessed.

5. Accordingly, pursuant to Section 503(b) of the Communications Act of 1934, as amended, 47 U.S.C. Section 503(b), and Section 1.80 of the Commission's Rules, 47 C.F.R. Sec. 1.80, Emery Telephone IS APPARENTLY LIABLE FOR A FORFEITURE in the amount of Four Thousand Dollars ($4,000) for willful and repeated violations of the aforementioned rule. The amount specified was determined after consideration of the factors set forth in Section 503(b)(2) of the Communications Act of 1934, as amended.

6. Payment of the forfeiture may be made by mailing a check or similar instrument, noting on the payment the File Number of the above captioned proceeding, to the Commission within thirty (30) days of the release date of this order, payable to the order of the Federal Communications Commission to: Federal Communications Commission, P.O. Box 73482, Chicago, Illinois 60673-7482.

7. A copy of this Notice is being sent to Emery Telephone, 150 South Main, P.O. Box 629, Orangeville, Utah 84537, by Certified Mail, Return Receipt Requested.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Services Division
Common Carrier Bureau

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> The term "willful", when used with reference to the commission or omission of any act, means the conscious and deliberate commission or omission of such act, irrespective of any intent to violate any provision of this Act or any rule or regulation of the Commission authorized by this Act or by a treaty ratified by the United States.

This definition applies to Section 503(b) of the Communications Act. *See Southern California Broadcasting Co.*, 6 FCC Rcd 4387 (1991).

Before the
Federal Communications Commission
Washington, D.C. 20554

In re Application of

SACRAMENTO RSA LIMITED PARTNERSHIP File No. 10420-CL-P-672-A-89

For facilities in the
Domestic Public Cellular
Telecommunications Radio Service
on Frequency Block A, in
Market 672, Texas 21 -
Chambers Rural Service Area

ERRATUM

Released: July 26, 1994

The Memorandum Opinion and Order released July 7, 1994 in the captioned proceeding, FCC 94-159, contains an incorrect adoption date of June 10, 1994. That Order is corrected to read: June 13, 1994.

FEDERAL COMMUNICATIONS COMMISSION

John Cimko
Chief, Mobile Service Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Rochester Telephone Corporation
Tariff F.C.C. No. 3

Transmittal No. 224

ORDER

Adopted: June 29, 1994; Released: June 30, 1994

By the Acting Chief, Tariff Division, Common Carrier Bureau:

1. Rochester Telephone Corporation (Rochester) filed Transmittal No. 224 on May 17, 1994 to introduce a video dialtone offering on a six-month trial basis.[1] Rochester's proposed video dialtone service utilizes: (1) a combination of fiber optic and coaxial cable (the "hybrid fiber-coaxial" system) to serve up to 100 subscribers; and (2) an Asymmetric Digital Subscriber Line (ADSL) system using existing copper loop plant to serve up to twenty subscribers. MCI Telecommunications Corporation (MCI) filed a petition to reject or suspend and investigate Transmittal No. 224, and Rochester filed a reply.

2. Rochester's trial video dialtone service consists of three elements: (1) a "broadcast" connection that provides a "programmer customer"[2] with access to all potential "subscribers"[3] within the service area of one of Rochester's "video dialtone distribution terminals;"[4] (2) a "video-on-demand" connection that enables a programmer-customer to offer an interactive channel to a subscriber-specific location where the subscriber would be able to choose individualized programming; and (3) an "ADSL" connection that would allow a programmer-customer to offer subscribers individualized programming similar to the video-on-demand option, with additional capacity.[5]

3. Rochester proposes three recurring charges and two nonrecurring charges for the various video dialtone connections.[6] During the trial period, a "programmer-customer" would pay the following discounted recurring rates if it commits to the full six-months of the market trial: (1) a broadcast connection charge of $0.12 per 6 MHz channel per potential subscriber; (2) a video-on-demand connection charge of $7.50 per 4 MHz interactive channel per actual subscriber per video distribution terminal; and (3) an ADSL connection charge of $7.50 per 1.5 Mbps interactive channel per actual subscriber. Nonrecurring charges would be waived during the trial period.

4. MCI contends that Rochester's proposed use of spare fiber optic and coaxial cables in the hybrid fiber-coaxial portion of its video dialtone market trial violates the condition in the *Rochester 214 Order* that no costs for the use or operation of the video dialtone offering be recovered in a telephony rate base.[7] MCI argues that Rochester's cost support is not sufficient to show that fiber-coaxial cable costs are not being borne by telephone ratepayers. MCI also argues that Rochester has failed to demonstrate that the costs associated with the copper local loop used in the ADSL portion of its video dialtone trial are not being recovered from8telephone ratepayers.[8]

5. MCI maintains that Rochester's use of the new services test to project cost and demand leads to misleading forecasts because it is based on the assumption of a permanent offering, not the six months of the market trial. It contends that Rochester should restate its costs and demand based solely on the six-month market trial period. MCI argues, in conclusion, that the issues raised in a pending petition for rule making filed by the Consumer Federation of America (CFA) and National Cable Television Association, Inc., (NTCA) regarding whether video dialtone service is an interstate access service must be resolved by the Commission prior to approval of Rochester's transmittal.[9]

6. Rochester replies that MCI's concerns regarding alleged cross-subsidization of the spare fiber and coaxial cable costs from its video dialtone customers to its telephony ratepayers is misplaced because the costs at issue are embedded and do not arise out of its video dialtone trial.[10] Rochester further contends that its proposed cost support complies with the requirement in the *Rochester Section 214 Order* that it segregate only the incremental costs of its video dialtone market trial into separate accounts.[11] Rochester also argues that its use of the new services test is a reasonable methodology for developing video dialtone rates.[12] Finally, Rochester contends that MCI's more general concerns regarding the jurisdictional status of video dialtone, and the corresponding effects on common line

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[1] Rochester received Section 214 authorization to conduct this market trial. Rochester Telephone Corporation, File No. W-P-C 6867, DA 94-275, 9 FCC Rcd 2285 (Domestic Facilities Div., 1994) (*Rochester 214 Order*).

[2] Rochester defines a "programmer-customer" as the party who provides video or other programming for transmission using the video dialtone service. Transmittal No. 224 at 6.

[3] A "subscriber" is the party who subscribes to services provided by Rochester's programmer-customer. A "potential" subscriber is defined as a home to which a coaxial drop is placed or already existing. Id. at 16.

[4] A "video dialtone distribution terminal" is defined as a central office electro-optical unit that transmits video dialtone signals in the 50-to-70 MHz range to approximately 100 living units. *Id.* at 16.

[5] *Id.* at 12.

[6] *Id.* at 16; Description and Justification at 8-9.

[7] 9 FCC Rcd at 2890 para. 17(a).

[8] MCI Petition at 3-5.

[9] *Id.* at 5-9 n.7, *citing* CFA-NTCA Petition for Rulemaking, RM 8221 (filed Apr. 8, 1993).

[10] Rochester Reply at 3. Rochester notes that the collecting data on relative usage of video dialtone and telephone services is one of the purposes of Rochester's trial, and it is required to, and plans to, make a full report of that data collection to the Commission. *Id.* at 4 n.5.

[11] *Id.* at 4-5 nn.6-7, *Rochester 214 Order*,. 9 FCC Rcd at 2888 paras. 11-12; *see also* Chesapeake and Potomac Telephone Co. of Virginia, 8 FCC Rcd 2313, 2316 (1993).

[12] Rochester Reply at 5-6.

demand growth, do not need to be resolved prior to approval of Rochester's trial because the pendency of such proceedings is no reason to delay a market trial.[13]

7. We have reviewed Rochester's Transmittal No. 224, the petition filed by MCI, and all associated pleadings. We conclude that Rochester's tariff is not patently unlawful so as to warrant rejection and that MCI has not raised any issue that warrants suspension and investigation of Rochester's tariff at this time.

8. Accordingly, IT IS ORDERED THAT the petition for suspension and investigation or rejection filed by MCI Telecommunications Corporation against Rochester Telephone Corporation, Transmittal No. 224, IS DENIED.

FEDERAL COMMUNICATIONS COMMISSION

David A. Nall
Acting Chief, Tariff Division
Common Carrier Bureau

[13] Rochester Reply at 7-8.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

MELBOURNE INTERNATIONAL COMMUNICATIONS, LIMITED — File No. I-T-C-94-066

Application for blanket authority pursuant to Section 214 of the Communications Act of 1934, as amended, to establish channels of communication between the U.S. and international locations via the TDRS-41 satellite for the provision of international communications services

ORDER AND AUTHORIZATION

Adopted: June 29, 1994; Released: July 26, 1994

By the Chief, International Facilities Division:

1. Upon consideration of the above-captioned uncontested application filed by Melbourne International Communications, Limited, (Melbourne) pursuant to Section 214 of the Communications Act of 1934, as amended, we find that the present and future public convenience and necessity require its grant.

2. Accordingly, IT IS ORDERED that application File No. I-T-C-94-066 IS GRANTED and Melbourne is authorized to:

a. lease from Columbia Communications Corporation (Columbia) and operate the satellite circuits specified in Attachment A (Parts A, B, and C respectively) between appropriately licensed earth stations in the United States and the TDRS-41 satellite connecting with similar facilities between the satellite and earth stations in the countries listed in Attachment A furnished by Melbourne's correspondents in those countries;[1]

b. lease and operate facilities in the U.S. earth stations authorized to communicate with the TDRS satellites;

c. lease and operate necessary domestic connecting facilities; and

d. use the facilities set forth in a, b and c above to provide private line services not interconnected with the public switched networks (10 64-kbps circuits to each location), switched services interconnected with the public switched networks (six 64-kbps circuits to each location) and a total of four (4) 36-MHz transponders on the TDRS-41 satellite between the U.S. and the countries listed Attachment A subject to any restrictions set forth in this or any other Commission Order involving separate international satellite systems.[2]

3. IT IS FURTHER ORDERED that Melbourne's request to provide services via the Intersputnik satellite systems IS DEFERRED.

4. IT IS FURTHER ORDERED that our authorization of Melbourne to provide private lines as part of the services authorized herein is limited to the provision of such private lines only between the United States and the points listed in Attachment A--that is, private lines which originate in the United States and terminate in the points listed in Attachment A or which originate in the points listed in Attachment A and terminate in the United States. In addition, Melbourne may not-- and its tariff must state that its customers may not--connect private lines provided over these facilities to the public switched network at either the U.S. end or the points listed in Attachment A, or both, for the provision of international basis telecommunications services, including switched voice services, unless authorized to do so by the Commission upon a finding that the points listed in Attachment A afford resale opportunities equivalent to those available under U.S. law, in accordance with *Regulation of International Accounting Rates, Phase II, First Report and Order*, 7 FCC Rcd 559 (1991), *petitions for reconsideration pending.*

5. IT IS FURTHER ORDERED that neither Melbourne nor any persons or companies directly or indirectly controlling or controlled by Melbourne, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession, contract, understanding, or work-

[1] Although Melbourne requested authority to provide service via the Intersputnik satellite system, we are unable to process that portion of its application at the present time due to the limited number of circuits consulted under Article XIV(d) of the INTELSAT Agreement. All circuits previously consulted under Article XIV(d) have been allocated.

[2] Melbourne requested authority to provide forty-eight (48) 64-kbps circuits for each location for switched services and an unlimited number of circuits to each location based on demand for non-interconnected services and international video services. Based on the number of countries covered by Melbourne's application and the limited capacity available over the TDRS-41 satellite, we find Melbourne's circuit requests to be unreasonable. In dealing with previous applications where excessive numbers of circuits have been requested over separate satellite systems, we have limited the number of circuits. Accordingly, Melbourne is authorized herein to establish ten (10) 64-kbps circuits to each locations for non-switched services, six (6) 64-kbps circuits to each location for switched services and a total of four (4) 36-MHz transponders to be used for all locations for the provision of television service. Should Melbourne's service requirements exceed the number of circuits authorized herein, Melbourne may file a new Section 214 application.

demand growth, do not need to be resolved prior to approval of Rochester's trial because the pendency of such proceedings is no reason to delay a market trial.[13]

7. We have reviewed Rochester's Transmittal No. 224, the petition filed by MCI, and all associated pleadings. We conclude that Rochester's tariff is not patently unlawful so as to warrant rejection and that MCI has not raised any issue that warrants suspension and investigation of Rochester's tariff at this time.

8. Accordingly, IT IS ORDERED THAT the petition for suspension and investigation or rejection filed by MCI Telecommunications Corporation against Rochester Telephone Corporation, Transmittal No. 224, IS DENIED.

FEDERAL COMMUNICATIONS COMMISSION

David A. Nall
Acting Chief, Tariff Division
Common Carrier Bureau

[13] Rochester Reply at 7-8.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

MELBOURNE INTERNATIONAL COMMUNICATIONS, LIMITED — File No. I-T-C-94-066

Application for blanket authority pursuant to Section 214 of the Communications Act of 1934, as amended, to establish channels of communication between the U.S. and international locations via the TDRS-41 satellite for the provision of international communications services

ORDER AND AUTHORIZATION

Adopted: June 29, 1994; Released: July 26, 1994

By the Chief, International Facilities Division:

1. Upon consideration of the above-captioned uncontested application filed by Melbourne International Communications, Limited, (Melbourne) pursuant to Section 214 of the Communications Act of 1934, as amended, we find that the present and future public convenience and necessity require its grant.

2. Accordingly, IT IS ORDERED that application File No. I-T-C-94-066 IS GRANTED and Melbourne is authorized to:

a. lease from Columbia Communications Corporation (Columbia) and operate the satellite circuits specified in Attachment A (Parts A, B, and C respectively) between appropriately licensed earth stations in the United States and the TDRS-41 satellite connecting with similar facilities between the satellite and earth stations in the countries listed in Attachment A furnished by Melbourne's correspondents in those countries;[1]

b. lease and operate facilities in the U.S. earth stations authorized to communicate with the TDRS satellites;

c. lease and operate necessary domestic connecting facilities; and

d. use the facilities set forth in a, b and c above to provide private line services not interconnected with the public switched networks (10 64-kbps circuits to each location), switched services interconnected with the public switched networks (six 64-kbps circuits to each location) and a total of four (4) 36-MHz transponders on the TDRS-41 satellite between the U.S. and the countries listed Attachment A subject to any restrictions set forth in this or any other Commission Order involving separate international satellite systems.[2]

3. IT IS FURTHER ORDERED that Melbourne's request to provide services via the Intersputnik satellite systems IS DEFERRED.

4. IT IS FURTHER ORDERED that our authorization of Melbourne to provide private lines as part of the services authorized herein is limited to the provision of such private lines only between the United States and the points listed in Attachment A--that is, private lines which originate in the United States and terminate in the points listed in Attachment A or which originate in the points listed in Attachment A and terminate in the United States. In addition, Melbourne may not-- and its tariff must state that its customers may not--connect private lines provided over these facilities to the public switched network at either the U.S. end or the points listed in Attachment A, or both, for the provision of international basis telecommunications services, including switched voice services, unless authorized to do so by the Commission upon a finding that the points listed in Attachment A afford resale opportunities equivalent to those available under U.S. law, in accordance with *Regulation of International Accounting Rates, Phase II, First Report and Order*, 7 FCC Rcd 559 (1991), *petitions for reconsideration pending.*

5. IT IS FURTHER ORDERED that neither Melbourne nor any persons or companies directly or indirectly controlling or controlled by Melbourne, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession, contract, understanding, or work-

[1] Although Melbourne requested authority to provide service via the Intersputnik satellite system, we are unable to process that portion of its application at the present time due to the limited number of circuits consulted under Article XIV(d) of the INTELSAT Agreement. All circuits previously consulted under Article XIV(d) have been allocated.

[2] Melbourne requested authority to provide forty-eight (48) 64-kbps circuits for each location for switched services and an unlimited number of circuits to each location based on demand for non-interconnected services and international video services. Based on the number of countries covered by Melbourne's application and the limited capacity available over the TDRS-41 satellite, we find Melbourne's circuit requests to be unreasonable. In dealing with previous applications where excessive numbers of circuits have been requested over separate satellite systems, we have limited the number of circuits. Accordingly, Melbourne is authorized herein to establish ten (10) 64-kbps circuits to each locations for non-switched services, six (6) 64-kbps circuits to each location for switched services and a total of four (4) 36-MHz transponders to be used for all locations for the provision of television service. Should Melbourne's service requirements exceed the number of circuits authorized herein, Melbourne may file a new Section 214 application.

ing arrangement to which Melbourne or any persons or companies controlling or controlled by Melbourne are parties.

6. IT IS FURTHER ORDERED the applicant shall file copies of any operating agreements, including the applicable accounting rate, it enters into with its foreign correspondents with the Commission within 30 days of their execution, and shall otherwise comply with the filing requirements contained in Section 43.51 of the Commission's Rules, 47 C.F.R. §43.51.

7. IT IS FURTHER ORDERED that the applicant shall file a tariff pursuant to Section 203 of the Communications Act, 47 U.S.C. §203, and Part 61 of the Commission's Rules, 47 C.F.R. Part 61, for the services authorized in this Order.

8. IT IS FURTHER ORDERED that the applicant shall file annual reports of overseas telecommunications traffic required by Section 43.61 of the Commission's Rules, 47 C.F.R. §43.61.

9. IT IS FURTHER ORDERED that the applicant shall file a separate Section 214 application for the use of any additional circuits it wishes to operate via the TDRS satellites.

10. IT IS FURTHER ORDERED that the number of circuits authorized herein for the provision of services via separate satellite systems is subject to limitations on the number of circuits specified under the separate systems policy and applicable consultations under Article XIV(d) of the INTELSAT Agreement.

11. This order is issued pursuant to Section 0.291 of the Commission's Rules and is effective upon adoption. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's Rules may be filed within 30 days of the public notice of this order (*see* Section 1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li
Chief, International Facilities Division

ATTACHMENT A

A. SERVICES INTERCONNECTED TO THE PUBLIC SWITCHED NETWORKS

Melbourne is authorized to establish up to six (6) 64-kbps circuits between the U.S. and all countries that are not members of INTELSAT, plus the United Kingdom and Germany.

B. SERVICES NOT INTERCONNECTED TO THE PUBLIC SWITCHED NETWORKS

Melbourne is authorized to establish up to ten (10) 64-kbps circuits between the U.S. and all countries which are not members of INTELSAT, plus each of the following locations:

Austria
Bahamas
Belgium
Canada
Denmark
Finland
France
Germany
Ireland
Israel
Jamaica
Liechtenstein
Luxembourg
Mexico
Netherlands
Portugal
Sweden
Switzerland
Turkey
United Kingdom

C. INTERNATIONAL VIDEO SERVICES

Melbourne is authorized to establish a total of four (4) 36-MHz transponders via the TDRS-41 satellite for the provision of international video services between the U.S. and the following locations:

Austria
Bahamas
Belgium
Canada
Denmark
Finland
France
Germany
Ireland
Israel
Jamaica
Liechtenstein
Luxembourg
Mexico
Netherlands
Portugal
Sweden
Switzerland
Turkey
United Kingdom

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

SPRINT COMMUNICATIONS COMPANY, L.P. File No. I-T-C-94-341

Application for authority to acquire and operate facilities for service between the U.S. and Lebanon.

ORDER, AUTHORIZATION AND CERTIFICATE

Adopted: July 13, 1994; Released: July 26, 1994

By the Chief, International Facilities Division:

1. Upon consideration of the above-captioned uncontested application, filed pursuant to Section 214 of the Communications Act of 1934, as amended, IT IS HEREBY CERTIFIED that the present and future public convenience and necessity require the provision of direct service between the U.S. and Lebanon by Sprint Communications Company, L.P. (Sprint).

2. Accordingly, IT IS ORDERED that application File No. I-T-C-94-341 IS GRANTED, and Sprint is authorized to:

a. lease from Comsat and operate 12 FDM satellite circuits between the Etam, West Virginia earth station and an appropriate INTELSAT satellite over the Atlantic Ocean, connecting with similar facilities between the satellite and an earth station in Lebanon, furnished by Sprint's correspondent in Lebanon;

b. lease and operate the necessary earth station capacity in the Etam earth station; and

c. own and/or lease and operate necessary connecting facilities between Sprint's New York International Switching Center and the Etam earth station; and

d. use the above facilities to provide Sprint's regularly authorized services, including switched voice service, between the U.S. and Lebanon.

3. IT IS FURTHER ORDERED that applicant shall file a copy of any operating agreement it enters into with its foreign correspondent with the Commission within 30 days of its execution, and shall otherwise comply with the filing requirements contained in Section 43.51 of the Commission's Rules, 47 C.F.R. § 43.51.

4. IT IS FURTHER ORDERED that Sprint's authorization to provide private lines, as part of its regularly authorized services, is limited to the provision of such private lines only between the United States and Lebanon -- that is, private lines which originate in the United States and terminate in Lebanon or which originate in Lebanon and terminate in the United States. In addition, Sprint may not - and Sprint's tariffs must state that its customers may not - connect private lines provided over these facilities to the public switched network at either the U.S. or foreign end, or both, for the provision of international basic telecommunications services, including switched voice services, unless authorized to do so by the Commission upon a finding that the foreign administration affords resale opportunities equivalent to those available under U.S. law, in accordance with *Regulation of International Accounting Rates*, Phase II, First Report and Order, 7 FCC Rcd 559 (1991), and Order on Reconsideration and Third Further Notice of Proposed Rulemaking, 7 FCC Rcd 7927 (1992), *petition for reconsideration pending.*

5. IT IS FURTHER ORDERED that neither Sprint nor any persons or companies directly or indirectly controlling it or controlled by it, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession, contract, understanding, or working arrangement to which Sprint or any persons or companies controlling or controlled by Sprint are parties.

6. IT IS FURTHER ORDERED that the applicant shall file a tariff pursuant to Section 203 of the Communications Act, 47 U.S.C. Section 203, and Part 61 of the Commission's Rules, 47 C.F.R. Part 61, for the services authorized herein.

7. IT IS FURTHER ORDERED that the applicant shall file the annual reports of overseas telecommunications traffic required by Section 43.61 of the Commission's Rules, 47 C.F.R. §43.61.

8. IT IS FURTHER ORDERED that the applicant shall file semi-annual circuit reports pursuant to Section 63.15(b) of the Commission's Rules, 47 C.F.R. Section 63.15(b).

9. The Commission retains jurisdiction over this matter to reallocate circuits in the satellite system among the various international common carriers and other authorized users as required to ensure nondiscriminatory use of, and equitable access to the communications satellite system.

10. This order is issued under Section 0.291 of the Commission's Rules and is effective upon adoption. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's Rules may be filed within 30 days of the date of public notice of this order (*see* Section 1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li
Chief, International Facilities Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

MCI TELECOMMUNICATIONS CORP. File No. I-T-C-94-323

Application for authority to acquire and operate facilities for service between the U.S. and Benin.

ORDER AND AUTHORIZATION

Adopted: July 13, 1994; Released: July 26, 1994

By the Chief, International Facilities Division:

1. Upon consideration of the above-captioned uncontested application, filed pursuant to Section 214 of the Communications Act of 1934, as amended, IT IS HEREBY CERTIFIED that the present and future public convenience and necessity require the provision of direct service between the U.S. and Benin by MCI Telecommunications Corporation (MCI).

2. Accordingly, IT IS ORDERED that application File No. I-T-C-94-323 IS GRANTED and MCI is authorized to:

a. lease from Comsat and operate four voice-grade satellite circuits between the Etam, West Virginia earth station and an appropriate INTELSAT satellite over the Atlantic Ocean, connecting with similar circuits between the satellite and an earth station in Benin furnished by MCI's correspondent in Benin;

b. lease and operate four voice-grade circuits in the Etam earth station to be used in conjunction with the satellite space segment capacity;

c. lease and operate four voice-grade connecting circuits between the Etam earth station and MCI's West Orange, New Jersey operating center; and

d. use facilities in a, b and c above to provide MCI's regularly authorized services between the U.S. and Benin.

3. IT IS FURTHER ORDERED that our authorization of MCI to provide private lines as part of its authorized services is limited to the provision of such private lines only between the United States and Benin -- that is, private lines which originate in the United States and terminate in Benin or which originate in Benin and terminate in the United States. In addition, MCI may not -- and MCI's tariff must state that MCI's customers may not -- connect private lines provided over these facilities to the public switched network at either the U.S. or Benin end, or both, for the provision of international basic telecommunications services, including switched voice services, unless authorized to do so by the Commission upon a finding that Benin affords resale opportunities equivalent to those available under U.S. law, in accordance with *Regulation of International Accounting Rates, Phase II, First Report and Order*, 7 FCC Rcd 559 (1991) *petitions for reconsideration pending.*

4. IT IS FURTHER ORDERED that neither MCI nor any persons or companies directly or indirectly controlling or controlled by MCI, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession, contract, understanding, or working arrangement to which MCI or any persons or companies controlling or controlled by MCI are parties.

5. IT IS FURTHER ORDERED that applicant shall file copies of any operating agreement it enters into with its foreign correspondent with the Commission within 30 days of its execution, and shall otherwise comply with the filing requirements contained in Section 43.51 of the Commission's Rules, 47 C.F.R. §43.51.

6. IT IS FURTHER ORDERED that the applicant shall file a tariff pursuant to Section 203 of the Communications Act, 47 U.S.C. §203, and Part 61 of the Commission's Rules, 47 C.F.R. Part 61, for the service authorized in this Order.

7. IT IS FURTHER ORDERED that the applicant shall file the annual reports of overseas telecommunications traffic required by Section 43.61 of the Commission's Rules, 47 C.F.R. §43.61.

8. IT IS FURTHER ORDERED that the applicant shall file semi-annual circuit reports pursuant to Section 63.15(b) of the Commission's Rules, 47 C.F.R. §63.15(b).

9. The Commission retains jurisdiction over this matter to reallocate circuits in the satellite system among the various international common carriers and other authorized users as required to ensure nondiscriminatory use of, and equitable access to, the communications satellite system.

10. This order is issued under Section 0.291 of the Commission's Rules and is effective upon adoption. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's Rules may be filed within 30 days of the date of public notice of this order (*see* Section 1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li
Chief, International Facilities Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In re

Complaint of

JOHNSON BROADCASTING, INC. CSR-4189-M

Against Prime Cable of Fort Bend, L.P. and Prime Cable Income Partners, L.P.[1]

MEMORANDUM OPINION AND ORDER

Adopted: July 18, 1994; Released: July 26, 1994

By the Chief, Cable Services Bureau:

INTRODUCTION

1. On January 10, 1994, Johnson Broadcasting, Inc. (hereinafter "KNWS"), licensee of Television station KNWS-TV (Ind., Channel 51),[2] Katy, Texas, filed the captioned complaint claiming that Prime Cable of Houston (hereinafter "Prime Cable") had declined to carry the station on its 11 cable systems as required by the Commission's must-carry rules.[3] Prime Cable filed an opposition on February 15, 1994, and KNWS filed its reply on March 2, 1994.

BACKGROUND

2. On November 3, 1993, pursuant to Section 73.1620(a)(1) of the Commission's rules,[4] KNWS submitted its application for license and notified the Commission that it had commenced operating pursuant to program test authority. On the same date, KNWS wrote a letter to Prime Cable requesting carriage as a must-carry station on cable channel 2 of Prime Cable's systems serving the Houston, Texas Area of Dominant Influence (hereinafter "ADI").[5] By letter dated December 3, 1993, Prime Cable notified KNWS that it "has decided not to add KNWS to its channel line-ups until after a Supreme Court decision that permits must-carry to survive."[6] According to KNWS, during a station tour on December 21, 1993, Prime Cable representatives advised the station that they would re-evaluate their decision not to carry KNWS after the new year. Subsequently, according to KNWS, on January 7, 1994, Prime Cable notified KNWS orally that the station could be added to the channel line-up in the fall of 1994 or winter of 1995.

3. Section 614(a) of the Communications Act of 1934 as amended, grants local commercial television stations the right to be carried on cable systems and to elect the cable channel on which the station's signal is carried.[7] New television stations must make their initial election within 30 days of commencing regular broadcasts. The initial election becomes effective 90 days after it is made.[8]

PROCEDURAL MATTERS

4. Initially, Prime Cable argues that KNWS has failed to follow the Commission's procedures for filing complaints against cable operators. First, it argues that KNWS incorrectly filed its complaint less than 90 days after it made its election. Thus, Prime Cable suggests that KNWS should have waited 90 days when its election would have become effective, before filing its complaint. Second, Prime Cable argues that KNWS never notified it, in writing, of any alleged violation of the must-carry rules as required by Section 76.61(a)(1) of the Commission's Rules. Rather, Prime Cable argues, the station sent only its initial notice requesting must-carry status. "If Prime Cable had received an informal complaint from Johnson ... Prime Cable would have explained to Johnson in a response prepared pursuant to Section 76.61(a)(2) of the Commission's rules, its legal basis for refusing carriage of KNWS-TV."

5. KNWS disputes Prime Cable's assertion that a television station must wait 90 days before filing its complaint. It asserts that Prime Cable made it clear that it would not carry the station and, therefore, further delay in filing its complaint was unnecessary. Next, KNWS disputes Prime Cable's claim that the station was required to file an informal complaint with the cable operator before initiating this Commission proceeding.

6. We find that Prime Cable's arguments lack merit. First, we disagree with Prime Cable's assertion that a new television station must wait 90 days (when the election of must-carry becomes effective) before filing a must-carry complaint. As the Commission has stated previously, a must-carry complaint must be filed within sixty (60) days of an "affirmative action" by a cable operator which directly affects the rights and interests of the station.[9] Such an affirmative action includes "a denial from a cable operator in response to a demand by the station for either carriage or channel position...."[10] Here, KNWS demanded must-carry carriage and a specific channel position in its letter dated November 3, 1993. Within thirty days, Prime Cable

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[1] Prime Cable of Fort Bend, L.P. and Prime Cable Income Partners, L.P. have the same managing general partner, Prime Venture I, Inc. which manages the cable systems of the two entities jointly.

[2] Public Notice was issued on January 26, 1994.

[3] Sections 76.56 and 76.57 of the Commission's Rules, as amended, 47 C.F.R. §§ 76.56, 76.57.

[4] 47 C.F.R. § 73.1620(a)(1).

[5] Prime Cable has 11 systems serving this area.

[6] Letter dated December 3, 1993, from Robert M. Burns, Vice President and Group Manager, Prime Cable. Noting an earlier conversation in which the parties discussed placing KNWS on the channel line-up in January 1994, Mr. Burns explained that, "[i]t has recently come to my attention, however, that the United States Supreme Court has agreed to review the must-carry provisions of the 1992 Cable Act and, further, that the Court's decision is expected early next year. Because must-carry is the basis for your carriage request on our cable systems, and because the must-carry rules have twice been overturned by lower courts, there exists a strong possibility that must-carry will again be reversed by the Supreme Court."

[7] *See* 47 U.S.C. § 534(a), (b)(6).

[8] *See* 47 C.F.R. § 76.64(f)(4).

[9] *See* 47 C.F.R. § 76.7(a)(4)(iii); *Report and Order* in MM Docket No. 92-259, 8 FCC Rcd 2965, 2995 (1993).

[10] *Report and Order*, at 2995.

was required to respond, in writing, and either commence carriage, or list its reasons why it did not believe that the station was entitled to must-carry status.[11] By letter dated December 3, 1993, Prime Cable fulfilled this requirement when it responded that it would not carry the station until the Supreme Court rendered a decision affirming the must-carry provisions. This response, in which Prime Cable denied KNWS's demand for must-carry carriage, constituted an "affirmative action" by a cable operator which directly affects the rights and interests of the station. Once this affirmative act occurred, KNWS had grounds to file a complaint with this Commission. An additional 60 day delay to see if Prime Cable would actually implement its decision not to carry KNWS was not required.

7. We also disagree with Prime Cable's argument that KNWS was required to send another letter to Prime Cable notifying it that its rejection of the request for must-carry was in violation of the Commission's rules. The Communications Act of 1934 and the Commission's rules regarding carriage disputes require that a commercial television station notify the operator, in writing, of its belief that the cable operator has failed to meet its must-carry obligations.[12] The cable operator then must, within 30 days, respond in writing and either carry the station or articulate its reasons for believing that it was not obligated to carry the signal.[13] We find that KNWS satisfied this requirement. KNWS's letter dated November 3, 1993, demanded carriage pursuant to the Commission's must-carry provisions. Thus, Prime Cable was notified that its failure to carry the station could be in violation of the Commission's must-carry provisions. Once it received this notice, Prime Cable had 30 days to respond with reasons why it did not believe that it was required to carry the station. Prime Cable exercised its opportunity in its December 3, 1993, letter. In light of Prime Cable's clear rejection of KNWS's demand for carriage, we find that no other correspondence with the cable operator was required.

SUBSTANTIVE ARGUMENTS OF THE PARTIES

8. KNWS argues that Prime Cable has failed to carry its signal in violation of our must-carry provisions. Specifically, it argues that Prime Cable's stated reason for rejecting the request – a pending Supreme Court decision – lacks merit as the Supreme Court has not stayed the effectiveness of the must-carry rules. In addition, it accuses Prime Cable of acting out of a economic motive to stifle competition for advertising revenues in Katy, Texas.

9. In response, Prime Cable argues that KNWS does not qualify for must-carry status. First, it argues that KNWS is not a licensed television station, but rather is operating only pursuant to program test authority. As a result, argues Prime Cable, the station is not a "local commercial broadcast station" as defined by the 1992 Cable Act's must-carry provisions. Next, Prime Cable asserts that KNWS is not a local station for three of its 11 systems because the station has not agreed to indemnify the operator for increased copyright liability resulting from carriage of a distant signal.[14] In addition, Prime Cable argues that a fourth system, its Needville system, "might not have" the channel capacity to carry KNWS. It notes that its Needville system has 26 usable activated channels of which nine must be used to carry local commercial television signals.[15] Prime Cable states that its system currently carries eight stations and is considering a ninth station. Next, Prime Cable argues that there is no basis for KNWS's demand for carriage on cable channel 2. It notes that KNWS broadcasts on on-air channel 51. In addition, it notes that, as a new station, KNWS was not carried on the systems in 1985 or 1992. Accordingly, Prime Cable argues that KNWS's channel position demand has no basis under our rules. Finally, Prime Cable argues that a forfeiture is not appropriate here since its actions were based on the mistaken belief of its manager regarding the speed with which the U.S. Supreme Court issues decisions following oral argument.

10. In reply, KNWS disputes Prime Cable's assertion that it is not a licensed station. Relying on Commission precedent,[16] it argues that, contrary to Prime Cable's assertions, program test authority is equivalent to a license within the meaning of the Communications Act. In addition, KNWS states that it is willing to pay copyright fees to those systems which might incur increased copyright liability for carriage of a distant signal.[17]

ANALYSIS

Must-Carry Obligations

11. First, Prime Cable's claim that it need not carry station KNWS because of a possible future ruling by the Supreme Court that the 1992 Cable Act's must-carry provisions may be unconstitutional is unpersuasive. The must-carry rules were not stayed pending the U.S. Supreme Court's review of challenges to those provisions. *See Turner Broadcasting System, Inc., et al., v. Federal Communications Commission*, 819 F. Supp. 32 (D.D.C. 1993), *vacated and remanded*, 62 U.S.L.W. 4647 (U.S. June 27, 1994). Thus, Prime Cable is obligated to comply with those provisions. It is irrelevant that Prime Cable's manager erroneously believed that the U.S. Supreme Court would render a decision on the constitutionality of these provisions immediately following oral argument.

12. Next, Prime Cable's argument that KNWS does not constitute a local commercial television station as defined by the 1992 Cable Act and our rules is unpersuasive. Section 614(h)(1)(A) defines a local commercial television station as "any full power television broadcast station, other than a qualified noncommercial educational television station within the meaning of Section 615(l)(1), licensed and operating on a channel regularly assigned to its community by the Commission...."[18] Section 76.55(c)(2) of the Commission's Rules provides that the term "local commercial

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[11] *See* 47 C.F.R. § 76.61(a)(2).
[12] *See* 47 C.F.R. § 76.61(a)(2).
[13] *See* 47 U.S.C. § 534(d)(1); 47 C.F.R. § 76.61(a)(1),(2).
[14] Prime Cable claims that KNWS would be a distant signal for its Pasadena, Highland, and Channelview systems. We note that this is apparently the first time that Prime Cable has mentioned copyright liability as a reason for rejecting the station's must-carry demand. We remind Prime Cable that Section 76.61 of the Commission's Rules requires a cable operator denying carriage to a station to submit in writing its reasons for believing that is not obligated to carry the signal. *See* 47 C.F.R. § 76.61(a)(2).
[15] *See* 47 C.F.R. § 76.56(b)(2).
[16] *See Queen City Broadcasting Co.*, 17 RR 1 (1958).
[17] *See* Declaration dated March 1, 1994, of Douglas Johnson, President of Johnson Broadcasting, Inc.
[18] 47 U.S.C. § 534(h)(1)(A).

television station" does not include a television broadcast station that would be considered a distant signal under the cable compulsory copyright license (17 U.S.C. § 111), if such station does not agree to indemnify the cable operator for any increased copyright liability resulting from carriage on the cable system.[19]

13. On April 21, 1994, the Commission granted KNWS's application for a license. Moreover, KNWS has agreed to indemnify Prime Cable for any increase in copyright liability. Accordingly, KNWS has perfected its must-carry rights with respect to Prime Cable's systems serving the Houston television market. In any event, we disagree with Prime Cable that a station operating under program test authority does not have must-carry rights. The Commission's rules authorize permittees of broadcast television stations to operate on program test authority upon completion of the construction of a television station so long as the operator notifies the Commission and submits an application of license within 10 days. *See* 47 C.F.R. § 73.1620(a). Since operators of these broadcast stations hold a permit to construct a station, are authorized to operate under program authority in accordance with the Commission's rules, and are awaiting an application for license, we see no reason why they should be denied must-carry rights. Moreover, the authorization granted KNWS-TV to commence operation was clearly a "license" as that term is defined in the Administrative Procedure Act, 5 U.S.C. § 551(8) which defines "license" to include "the whole or a part of an agency permit, certificate, approval, registration, charter, membership, statutory exemption or other form of permission."

14. Finally, Prime Cable's assertions that its Needville system "might not have" the channel capacity to carry KNWS-TV also lacks merit. Under the application of the Commission's must-carry rules, Prime Cable is required to determine whether a station with must-carry status falls within the system's must-carry compliment. Prime Cable has clearly violated this obligation by claiming that it might carry another must-carry station in the future.

Channel Position Request

15. Section 76.57 of the Commission's Rules allows a commercial broadcast station to elect carriage on the cable system channel number on which the station is broadcast over the air, the channel on which the station was carried on July 19, 1985, or on the channel on which the station was carried on January 1, 1992.[20] KNWS's signal is not carried over the air on channel 2 but instead is carried on channel 51. In addition, as KNWS is a new television station, it was not carried by Prime Cable's systems on July 19, 1985, or January 1, 1992. Accordingly, KNWS's channel position request is unfounded.

ORDERING CLAUSES

16. Accordingly, IT IS ORDERED, that the complaint filed by Johnson Broadcasting, Inc. against Prime Cable IS GRANTED to the extent discussed in paragraphs 11-14 in accordance with Section 614 (47 U.S.C. § 534) of the Communications Act of 1934, as amended.[21]

17. IT IS FURTHER ORDERED, that Prime Cable must commence carriage of Station KNWS-TV, Katy, Texas on the 11 Prime Cable systems serving the Houston, Texas, ADI, within forty-five (45) days from the release date of this *Order*.[22]

18. This action is taken pursuant to delegated authority under Section 0.321 of the Commission's Rules, as amended, 47 C.F.R. § 0.321.

FEDERAL COMMUNICATIONS COMMISSION

Meredith J. Jones
Chief, Cable Services Bureau

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[19] 47 C.F.R. § 76.55(c)(2).

[20] *See* 47 C.F.R. § 76.57.

[21] In order to expedite the resolution of this dispute we are reserving judgment on KNWS's' request that a forfeiture should be imposed on Prime Cable. That issue will be considered separately and action taken as warranted.

[22] With respect to Prime Cable's Pasadena, Highland, and Channelview systems, we will require carriage so long as KNWS provides Prime Cable with a written commitment to pay the actual amount of copyright liability. *See Report and Order*, at 2993.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Alcatel Network Systems, Inc.
Petition for Rulemaking to Amend Part 68
of the Commission's Rules

ORDER GRANTING MOTION FOR EXTENSION OF TIME TO FILE COMMENTS AND REPLY COMMENTS

Adopted: July 15, 1994; Released: July 18, 1994

By the Chief, Domestic Facilities Division:

1. On June 23, 1994, the Commission released a Public Notice establishing a pleading cycle for comments on a rulemaking petition filed June 14, 1994, by Alcatel Network Systems, Inc. (Alcatel). In its petition, Alcatel argues that while terminals connected to 1.544 Mbps Digital Services are subject to Part 68, Subpart D, these Rules are inconsistent with industry requirements for 1.544 Mbps digital terminals using a DSX interface. Alcatel requests that the Commission amend Part 68, Subpart D, of its Rules to limit their application to digital terminals using T1 span line, office-to-office interfaces.

2. On July 8, 1994, the Telecommunications Industry Association (TIA) filed a motion requesting a one month extension of time, until August 22, to file comments on the petition, and a one month extension of time, until September 22, to file replies. TIA requests this extension to allow it time to conduct a meeting of one of its working groups with special expertise to review the technical and policy issues raised in the petition. TIA views such issues as important to its membership. Alacatel welcomes TIA's interest in its petition, and supports grant of the motion.[1]

3. On July 11, 1994, the North American Telecommunications Association (NATA) also filed a motion requesting an extension of time identical to that of TIA. NATA states that Alcatel's proposal may have significant implications for its membership and that additional time will be required to respond to the highly technical subject matter of the petition. In the event that the Commission does not grant a general extension of time, NATA requests that it receive an extension of time for its individual comments.

4. As set forth in Section 1.46 of the Commission's Rules, 47 C.F.R. Section 1.46, it is our policy that extensions of time not be routinely granted. We find, however, that TIA and NATA have shown good cause for the requested extension, and we believe that the public interest will be served by granting a 30 day extension of time to file comments and a 30 day extension of time to file reply comments. We therefore grant the requested relief.

5. Accordingly, IT IS ORDERED, that the Request for Extension of Time filed by Petitioners is GRANTED.

6. IT IS THEREFORE ORDERED that the date for filing comments on Alcatel's petition IS EXTENDED to **August 22, 1994**, and the date for filing replies IS EXTENDED to **September 22, 1994**.

7. This action is taken pursuant to authority found in Sections 4(i) and (r) of the Communications Act of 1934, as amended. 47 U.S.C. Sections 4(i) and 303(r) and Sections 00.204(b), 0.283 and 1.46 of the Commission's Rules, 47 C.F.R. Sections 0.204(b), 0.283 and 1.46.

8. For further information concerning this proceeding, contact Marian Gordon, Domestic Facilities Division, Common Carrier Bureau (202) 634-4215.

FEDERAL COMMUNICATIONS COMMISSION

James R. Keegan
Chief, Domestic Facilities Division
Common Carrier Bureau

[1] Letter from Robert J. Miller, Attorney for Alcatel to William F. Caton, Acting Secretary, FCC (July 13, 1994).

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: July 8, 1994

COMMISSION INSTRUCTS GENERAL COUNSEL TO SEEK REMAND OF BROADBAND PERSONAL COMMUNICATIONS SERVICE PIONEER'S PREFERENCE CASES

The Federal Communications Commission has instructed its General Counsel to file a motion for remand of pending cases in the District of Columbia Circuit seeking judicial review of the Commission's decision to grant broadband personal communications service (PCS) licenses free of charge to three pioneer's preference applicants. *Pacific Bell v. FCC*, D.C. Circuit No. 94-1148 (and consolidated cases). A copy of the Commission's motion for remand is attached to this notice. In instructing the General Counsel to seek remand of the cases, the three Commissioners participating in this matter stated that they intended to reconsider the substance of the decision not to charge these pioneer's preference winners for licenses in circumstances where other licensees in the same service would have to pay substantial amounts in order to prevail in competitive bidding procedures. The Commission decisions on review in these cases are the *First Report and Order* in ET Docket No. 93-266, 9 FCC Rcd 605 (1994), and the *Third Report and Order* in General Docket No. 90-314, 9 FCC Rcd 1137 (1994).

Action by the Commission July 8, 1994, Commissioners Quello, Barrett and Ness voting; Chairman Hundt and Commissioner Chong not participating.

IN THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

PACIFIC BELL, *et al.*,
Petitioner,

v. No. 94-1148 (and consolidated cases)

FEDERAL COMMUNICATIONS COMMISSION
and UNITED STATES OF AMERICA,
Respondents.

EMERGENCY MOTION FOR REMAND

The Federal Communications Commission respectfully moves for a remand of the above captioned case so that it can give further consideration to certain aspects of the orders challenged by the petitioners. The Commission asks the Court to treat this motion as an emergency motion in light of the concerns that prompted the Court to order an expedited briefing schedule. In the pages that follow, the Commission describes the background of the case, explains its reasons for requesting a remand, and proposes a procedural schedule that will enable the Commission to reconsider issues on remand without impeding the Court's expeditious review of the Commission's orders.

This case presents a challenge to the three "pioneer's preferences" awarded by the Federal Communications Commission to applicants for licenses to provide broadband personal communications service ("broadband PCS").[1] Under the Commission orders that are at issue, three innovators in the field of wireless communications were awarded preferences that entitle them to obtain licenses, at no cost, to provide broadband PCS, provided that they satisfy technical and financial qualifications and that the grant of their applications is determined to be in the public interest. A number of disappointed applicants for pioneer's preferences petitioned for review by this Court, raising a number of challenges to the awards. Their primary argument is that the Commission "failed to explain adequately its decision to retain the pioneer's preference program -- and to award preference recipients licenses for free -- despite congressional authorization to sell licenses at auction and congressional direction to prevent unjust enrichment." Br. for Pacific Bell *et al.* 1. The petitioners ask this Court to vacate the Commission's orders. *Id.* at 51. The petitioners asked this Court to expedite consideration of their challenges, because the Commission intends to start auctioning the remaining broadband PCS licenses at the end of the year. Over the Commission's opposition, the Court expedited the case; the petitioners filed their brief on June 17 and the Commission's brief currently is due on July 15, although the Commission has sought an extension to July 19. No date has been set for oral argument.

The Commission has issued a number of orders relating to the broadband PCS auctions since the orders at issue were released, and the Commission's understanding of the PCS marketplace and the auction process has developed as it has resolved various issues relating to the auctions. Specifically, for example, the Commission now has a fuller understanding of the competitive implications of one licensee receiving its license without payment while its competitors, under an auction process, must pay significant amounts for their licenses.

In light of our current understanding of these issues, we agree that the Commission's stated rationale is no longer adequate to support its decision to award licenses to preference recipients for free. As the petitioners state, the Commission's rationale for awarding licenses for free is set forth in a single paragraph that fails to take account of all the relevant circumstances as we now understand them. More specifically, the Commission failed to address the fact that the pioneer's preference program was initiated in an era when licenses were awarded through lotteries and com-

[1] Broadband PCS will provide a variety of mobile services that will compete with existing cellular services.

parative hearings, and all licenses were awarded free of charge, whereas the Commission now has authority to auction licenses, and licensees are expected to pay a substantial amount of money for the licenses. Accordingly, we believe that, following oral argument, this Court would ultimately vacate the Commission's orders and remand for further proceedings. We therefore ask this Court to remand the cases to the Commission now.[2]

This request is not made for purposes of delay. We are not requesting remand just to have the opportunity to better explain the Commission's prior decisions. To the contrary, holding the broadband PCS auction as soon as possible is of vital importance to the Commission, and the Commission intends to take every step possible to adhere to its schedule for initiating broadband auctions at the end of 1994. Indeed, ensuring that the auction can be held on schedule is one of our primary motives for seeking a voluntary remand. That is, as matters stand, sometime this Fall, this Court would vacate the Commission's orders that are at issue and remand the case to the Commission for further consideration, which might set back the auction date.

For those reasons, as well as some reasons identified by the petitioners in their brief, the Commission intends to reconsider both the rationale and the substance of the decisions at issue. In particular, the Commission has authorized litigation counsel to advise the Court that it will give serious consideration to the proposal that recipients of pioneer's preferences for broadband PCS licenses be required to pay some amount for the licenses, taking account of all the relevant circumstances and the competing equities.

We realize that this Court expedited consideration of this case over our opposition. At the time that we opposed expedition, however, we were not able to advise the Court that the Commission recognized that its prior explanation for its decision was deficient. Nor were we able to advise the Court that the Commission intends to reconsider the substance of its decisions. In light of the Commission's current position, it does not make sense for this Court to review orders that the Commission acknowledges are inadequate and intends to change.

Like the petitioners, we favor expedition in order to ensure that the case can be resolved before the auction begins by the end of the year. Moreover, we recognize that any order on remand that the Commission issues in this proceeding is likely to be challenged in this Court, and that the petitioners will argue that the auction should not take place until their challenges are resolved. Accordingly, the Commission is prepared to issue a revised order within two weeks after the Court remands the case to the Commission. We would propose that the Court order any party that wants to challenge the order on remand to file a brief three weeks after the Commission releases it, and then allow the Commission three weeks to file a brief responding to any arguments in the briefs already on file that are unaffected by the Commission's revised order and to the arguments in the additional briefs that will be filed. We would then ask the Court to hold oral argument and issue a decision as soon as its schedule permits.

The Court should remand the case to the Commission.

Respectfully submitted,

William E. Kennard
General Counsel

Christopher J. Wright
Deputy General Counsel

John E. Ingle
Deputy Associate General Counsel

James M. Carr
Counsel
Federal Communications Commission
Washington, D.C. 20554

July 8, 1994

[2] In *Wrather-Alvarez Broadcasting v. FCC*, 248 F.2d 646, 649 (D.C. Cir. 1957), this Court made clear that where, as here, petitions for review have been filed with the Court and petitions for reconsideration have been filed with the Commission, both tribunals have jurisdiction. However, the Court added that "[t]he Commission's normal deference to the court as the reviewing tribunal and the principle of judicial self-restraint can be relied upon to avoid unseemly conflict." *Ibid.* Since this Court previously decided to expedite consideration of the petitions for review, we do not think it appropriate for the Commission to go forward with reconsideration without approval from the Court through a voluntary remand.

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 94-84

In the Matter of

Amendment of Section 73.202(b), RM-8478
Table of Allotments,
FM Broadcast Stations.
(Driscoll, Gregory and
Robstown, Texas)

NOTICE OF PROPOSED RULE MAKING

Adopted: July 14, 1994; Released: July 27, 1994

Comment Date: September 19, 1994
Reply Comment Date: October 4, 1994

By the Acting Chief, Allocations Branch:

1. The Commission has before it the petition for rule making filed by Cotton Broadcasting ("petitioner"), licensee of Station KMIQ-FM, Channel 286A, Robstown, Texas, proposing the substitution of Channel 283C3 for Channel 286A, the reallotment of Channel 283C3 from Robstown to Driscoll, Texas and the modification of petitioner's license to specify Driscoll as Station KMIQ-FM's community of license. In order to accommodate the allotment of Channel 283C3 to Driscoll, petitioner also requests the deletion of vacant Channel 283A at Gregory, Texas.

2. Petitioner seeks modification of Station KMIQ-FM's license pursuant to the provisions of Section 1.420(i) of the Commission's Rules, which permits the licensee of an existing station a higher class channel and/or a new community of license without affording other interested parties an opportunity to file competing expressions of interest. Petitioner believes that the adoption of its proposal will result in a preferential arrangement of allotments by providing a first local aural transmission service to the community of Driscoll (population 688).[1] Petitioner adds that Robstown will continue to receive local aural transmission service from Station KSAB-FM and Station KGLF-AM. Petitioner states that Driscoll is an incorporated municipality with its own Mayor and city council, a police department and provides other services to its residents. Petitioner claims that the requested reallotment and upgrade of Station KMIQ-FM at Driscoll will serve 315,184 persons in 4,798 square kilometers, which represents an increase of 443% in population and a 284% increase in 60 dBu land area. In support of its proposal to delete Channel 283A at Gregory, petitioner states that since the allotment of Channel 283A at Gregory in 1988, no station has ever been constructed and the only construction permit issued has been subsequently cancelled. Petitioner claims that although the deletion of Channel 283A would leave Gregory with no local service, the community will continue to receive aural reception service from twenty stations located in the Corpus Christi, Texas, area.

3. We believe the proposal warrants further consideration since it could provide Driscoll with its first local aural transmission service. However, since petitioner proposes to relocate Station KMIQ-FM's transmitter site, we request that petitioner provide information showing the areas and populations which will receive new service and the areas and populations which will lose existing service if Channel 283C3 is allotted to Driscoll. The study should also indicate the number of reception services which are now available within the gains and loss areas.

4. Channel 283C3 can be allotted to Driscoll in compliance with the Commission's minimum distance separation requirements with a site restriction of 10.8 kilometers (6.7 miles) south to accommodate petitioner's desired site.[2] As requested, we also propose to modify petitioner's authorization for Station KMIQ-FM at Robstown to specify Driscoll as its community of license. In accordance with Section 1.420(i) of the Commission's Rules, we will not accept competing expressions of interest in the use of Channel 283C3 at Driscoll or require the petitioner to demonstrate the availability of an additional equivalent class channel for use by such parties.

5. We will also propose the deletion of Channel 283A at Gregory, since it could enable Station KMIQ-FM to provide Driscoll with its first local aural transmission service and expand its service area.[3] However, we note that the Commission does not delete achannel where an expression of interest is demonstrated by the filing of an application. Therefore, should the Commission receive an acceptable application by the initial comment deadline specified herein for Channel 283A at Gregory, Texas, petitioner's proposal to delete Channel 283A at Gregory may be dismissed.

6. Accordingly, we seek comments on the proposed amendment of the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, for the community listed below, to read as follows:

	Channel No.	
City	Present	Proposed
Driscoll, Texas	--	283C3
Robstown, Texas	260C1, 286A	260C1
Gregory, Texas	283A	--

7. The Commission's authority to institute rule making proceedings, showings required, cut-off procedures, and filing requirements are contained in the attached Appendix and are incorporated by reference herein. In particular, we note that a showing of continuing interest is required by paragraph 2 of the Appendix before a channel will be allotted.

8. Interested parties may file comments on or before **September 19, 1994**, and reply comments on or before **October 4, 1994**, and are advised to read the Appendix for

[1] Population figures were taken from the 1990 U.S. Census.
[2] The coordinates for Channel 283C3 at Driscoll are North Latitude 27-34-45 and West Longitude 97-43-48.
[3] Commission's records indicate that SGBC, Inc.'s construction permit for Channel 283A at Gregory, Texas, was forfeited and cancelled on December 16, 1992.

the proper procedures. Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554. Additionally, a copy of such comments should be served on the petitioner, or its counsel or consultant, as follows:

Lee J. Peltzman, Esq.
Shainis & Peltzman
Suite 200
2000 L Street
Washington, D.C. 20036
(Counsel for petitioner)

9. The Commission has determined that the relevant provisions of the Regulatory Flexibility Act of 1980 do not apply to rule making proceedings to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules. *See Certification That Sections 603 and 604 of the Regulatory Flexibility Act Do Not Apply to Rule Making to Amend Sections 73.202(b), 73.504 and 73.606(b) of the Commission's Rules*, 46 FR 11549, February 9, 1981.

10. For further information concerning this proceeding, contact Pamela Blumenthal, Mass Media Bureau, (202)634-6530. For purposes of this restricted notice and comment rule making proceeding, members of the public are advised that no *ex parte* presentations are permitted from the time the Commission adopts a Notice of Proposed Rule Making until the proceeding has been decided and such decision is no longer subject to reconsideration by the Commission or review by any court. An *ex parte* presentation is not prohibited if specifically requested by the Commission or staff for the clarification or adduction of evidence or resolution of issues in the proceeding. However, any new written information elicited from such a request or a summary of any new oral information shall be served by the person making the presentation upon the other parties to the proceeding unless the Commission specifically waives this service requirement. Any comment which has not been served on the petitioner constitutes an *ex parte* presentation and shall not be considered in the proceeding. Any reply comment which has not been served on the person(s) who filed the comment, to which the reply is directed, constitutes an *ex parte* presentation and shall not be considered in the proceeding.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

APPENDIX

1. Pursuant to authority found in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61 0.204(b) and 0.283 of the Commission's Rules, IT IS PROPOSED TO AMEND the FM Table of Allotments, Section 73.202(b) of the Commission's Rules and Regulations, as set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached.

2. *Showings Required.* Comments are invited on the proposal(s) discussed in the *Notice of Proposed Rule Making* to which this Appendix is attached. Proponent(s) will be expected to answer whatever questions are presented in initial comments. The proponent of a proposed allotment is also expected to file comments even if it only resubmits or incorporates by reference its former pleadings. It should also restate its present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly. Failure to file may lead to denial of the request.

3. *Cut-off Procedures.* The following procedures will govern the consideration of filings in this proceeding.

(a) Counterproposals advanced in this proceeding itself will be considered if advanced in initial comments, so that parties may comment on them in reply comments. They will not be considered if advanced in reply comments. *(See* Section 1.420(d) of the Commission's Rules.)

(b) With respect to petitions for rule making which conflict with the proposal(s) in this *Notice*, they will be considered as comments in the proceeding, and Public Notice to this effect will be given as long as they are filed before the date for filing initial comments herein. If they are filed later than that, they will not be considered in connection with the decision in this docket.

(c) The filing of a counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved.

4. *Comments and Reply Comments; Service.* Pursuant to applicable procedures set out in Sections 1.415 and 1.420 of the Commission's Rules and Regulations, interested parties may file comments and reply comments on or before the dates set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached. All submissions by parties to this proceeding or by persons acting on behalf of such parties must be made in written comments, reply comments, or other appropriate pleadings. Comments shall be served on the petitioner by the person filing the comments. Reply comments shall be served on the person(s) who filed comments to which the reply is directed. Such comments and reply comments shall be accompanied by a certificate of service. *(See* Section 1.420(a), (b) and (c) of the Commission's Rules.) Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554.

5. *Number of Copies.* In accordance with the provisions of Section 1.420 of the Commission's Rules and Regulations, an original and four copies of all comments, reply comments, pleadings, briefs, or other documents shall be furnished the Commission.

6. *Public Inspection of Filings.* All filings made in this proceeding will be available for examination by interested parties during regular business hours in the Commission's Public Reference Room at its headquarters, 1919 M Street N.W., Washington, D.C.

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 94-83

In the Matter of

Amendment of Section 73.202(b), RM-8494
Table of Allotments,
FM Broadcast Stations.
(Cascade, Montana)

NOTICE OF PROPOSED RULE MAKING

Adopted: July 14, 1994; Released: July 27, 1994

Comment Date: September 19, 1994
Reply Comment Date: October 4, 1994

By the Acting Chief, Allocations Branch:

1. Before the Commission for consideration is a petition for rule making filed by Stephen D. Dow ("petitioner"), seeking the allotment of Channel 285C to Cascade, Montana, as that community's first local broadcast service. Petitioner provided an engineering study in support of the proposal and indicated he would apply for the channel, if allotted.

2. We believe the proposal warrants consideration because the proposed allotment would provide a first local service to Cascade, Montana. Channel 285C can be allotted to Cascade consistent with the minimum distance separation requirements of the Commission's Rules provided there is a site restriction 29.7 kilometers (18.4 miles) northeast of the community.[1] The site restriction will prevent a short spacing to Station KMTX-FM, Channel 287C, at Helena, Montana. Since Cascade is located within 320 kilometers (200 miles) of the U.S.-Canadian border, concurrence of the Canadian government will be requested for this allotment.

3. In view of the fact that the proposed allotment would provide a first local FM service to Cascade, Montana, the Commission believes it would serve the public interest to propose amending the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, for the community listed below, to read as follows:

	Channel No.	
City	Present	Proposed
Cascade, Montana	---	285C

4. The Commission's authority to institute rule making proceedings, showings required, cut-off procedures, and filing requirements are contained in the attached Appendix and are incorporated by reference herein. In particular, we note that a showing of continuing interest is required by paragraph 2 of the Appendix before a channel will be allotted.

5. Interested parties may file comments on or before **September 19, 1994**, and reply comments on or before **October 4, 1994**, and are advised to read the Appendix for the proper procedures. Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554. Additionally, a copy of such comments should be served on the petitioner's counsel, as follows:

David L. Hill
Audrey P. Rasmussen
O' Connor & Hannan
1919 Pennsylvania Avenue, N. W., Suite 800
Washington, D.C. 20006

6. The Commission has determined that the relevant provisions of the Regulatory Flexibility Act of 1980 do not apply to rule making proceedings to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules. See *Certification that Sections 603 and 604 of the Regulatory Flexibility Act Do Not Apply to Rule Making to Amend Sections 73.202(b), 73.504 and 73.606(b) of the Commission's Rules*, 46 FR 11549, February 9, 1981.

7. For further information concerning this proceeding, contact Kathleen Scheuerle, Mass Media Bureau, (202) 634-6530. For purposes of this restricted notice and comment rule making proceeding, members of the public are advised that no *ex parte* presentations are permitted from the time the Commission adopts a Notice of Proposed Rule Making until the proceeding has been decided and such decision is no longer subject to reconsideration by the Commission or review by any court. An *ex parte* presentation is not prohibited if specifically requested by the Commission or staff for the clarification or adduction of evidence or resolution of issues in the proceeding. However, any new written information elicited from such a request or a summary of any new oral information shall be served by the person making the presentation upon the other parties to the proceeding unless the Commission specifically waives this service requirement. Any comment which has not been served on the petitioner constitutes an *ex parte* presentation and shall not be considered in the proceeding. Any reply comment which has not been served on the person(s) who filed the comment, to which the reply is directed, constitutes an *ex parte* presentation and shall not be considered in this proceeding.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

[1] The coordinates for Channel 285C at Cascade are 47-28-43 and 111-27-13.

APPENDIX

1. Pursuant to authority found in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61 0.204(b) and 0.283 of the Commission's Rules, IT IS PROPOSED TO AMEND the FM Table of Allotments, Section 73.202(b) of the Commission's Rules and Regulations, as set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached.

2. *Showings Required.* Comments are invited on the proposal(s) discussed in the *Notice of Proposed Rule Making* to which this Appendix is attached. Proponent(s) will be expected to answer whatever questions are presented in initial comments. The proponent of a proposed allotment is also expected to file comments even if it only resubmits or incorporates by reference its former pleadings. It should also restate its present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly. Failure to file may lead to denial of the request.

3. *Cut-off Procedures.* The following procedures will govern the consideration of filings in this proceeding.

(a) Counterproposals advanced in this proceeding itself will be considered if advanced in initial comments, so that parties may comment on them in reply comments. They will not be considered if advanced in reply comments. *(See* Section 1.420(d) of the Commission's Rules.)

(b) With respect to petitions for rule making which conflict with the proposal(s) in this *Notice,* they will be considered as comments in the proceeding, and Public Notice to this effect will be given as long as they are filed before the date for filing initial comments herein. If they are filed later than that, they will not be considered in connection with the decision in this docket.

(c) The filing of a counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved.

4. *Comments and Reply Comments; Service.* Pursuant to applicable procedures set out in Sections 1.415 and 1.420 of the Commission's Rules and Regulations, interested parties may file comments and reply comments on or before the dates set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached. All submissions by parties to this proceeding or by persons acting on behalf of such parties must be made in written comments, reply comments, or other appropriate pleadings. Comments shall be served on the petitioner by the person filing the comments. Reply comments shall be served on the person(s) who filed comments to which the reply is directed. Such comments and reply comments shall be accompanied by a certificate of service. *(See* Section 1.420(a), (b) and (c) of the Commission's Rules.) Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554.

5. *Number of Copies.* In accordance with the provisions of Section 1.420 of the Commission's Rules and Regulations, an original and four copies of all comments, reply comments, pleadings, briefs, or other documents shall be furnished the Commission.

6. *Public Inspection of Filings.* All filings made in this proceeding will be available for examination by interested parties during regular business hours in the Commission's Public Reference Room at its headquarters, 1919 M Street N.W., Washington, D.C.

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 94-86

In the Matter of

Amendment of Section 73.202(b), RM-8497
Table of Allotments,
FM Broadcast Stations.
(Klamath Falls, Oregon)

NOTICE OF PROPOSED RULE MAKING

Adopted: July 18, 1994; Released: July 27, 1994

Comment Date: September 19, 1994
Reply Comment Date: October 4, 1994

By the Acting Chief, Allocations Branch:

1. The Commission has before it the petition for rule making filed by Terry A. Cowan ("petitioner") requesting the allotment of Channel 284C1 to Klamath Falls, Oregon, as the community's fourth local FM service. Petitioner states that he will apply for the channel, if allotted.

2. We believe the public interest would be served by proposing the allotment of Channel 284C1 to Klamath Falls since it could provide the community with an additional wide coverage area FM service. Channel 284C1 can be allotted to Klamath Falls in compliance with the Commission's minimum distance separation requirements without the imposition of a site restriction.[1]

3. Accordingly, we seek comments on the proposed amendment of the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, for the community listed below, to read as follows:

	Channel No.	
City	Present	Proposed
Klamath Falls, Oregon	223C, 258C, 295C1	223C, 258C, 284C1, 295C1

4. The Commission's authority to institute rule making proceedings, showings required, cut-off procedures, and filing requirements are contained in the attached Appendix and are incorporated by reference herein. In particular, we note that a showing of continuing interest is required by paragraph 2 of the Appendix before a channel will be allotted.

5. Interested parties may file comments on or before **September 19, 1994**, and reply comments on or before **October 4, 1994**, and are advised to read the Appendix for the proper procedures. Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554. Additionally, a copy of such comments should be served on the petitioner, or its counsel or consultant, as follows:

Leonard S. Joyce, Esq.
5335 Wisconsin Avenue, N.W.
Suite 300
Washington, D.C. 20015
(Counsel to petitioner)

6. The Commission has determined that the relevant provisions of the Regulatory Flexibility Act of 1980 do not apply to rule making proceedings to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules. *See Certification That Sections 603 and 604 of the Regulatory Flexibility Act Do Not Apply to Rule Making to Amend Sections 73.202(b), 73.504 and 73.606(b) of the Commission's Rules*, 46 FR 11549, February 9, 1981.

7. For further information concerning this proceeding, contact Leslie K. Shapiro, Mass Media Bureau, (202) 634-6530. For purposes of this restricted notice and comment rule making proceeding, members of the public are advised that no *ex parte* presentations are permitted from the time the Commission adopts a Notice of Proposed Rule Making until the proceeding has been decided and such decision is no longer subject to reconsideration by the Commission or review by any court. An *ex parte* presentation is not prohibited if specifically requested by the Commission or staff for the clarification or adduction of evidence or resolution of issues in the proceeding. However, any new written information elicited from such a request or a summary of any new oral information shall be served by the person making the presentation upon the other parties to the proceeding unless the Commission specifically waives this service requirement. Any comment which has not been served on the petitioner constitutes an *ex parte* presentation and shall not be considered in the proceeding. Any reply comment which has not been served on the person(s) who filed the comment, to which the reply is directed, constitutes an *ex parte* presentation and shall not be considered in the proceeding.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

[1] The coordinates for Channel 284C1 at Klamath Falls are 42-12-56 North Latitude and 121-47-56 West Longitude.

APPENDIX

1. Pursuant to authority found in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61 0.204(b) and 0.283 of the Commission's Rules, IT IS PROPOSED TO AMEND the FM Table of Allotments, Section 73.202(b) of the Commission's Rules and Regulations, as set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached.

2. *Showings Required.* Comments are invited on the proposal(s) discussed in the *Notice of Proposed Rule Making* to which this Appendix is attached. Proponent(s) will be expected to answer whatever questions are presented in initial comments. The proponent of a proposed allotment is also expected to file comments even if it only resubmits or incorporates by reference its former pleadings. It should also restate its present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly. Failure to file may lead to denial of the request.

3. *Cut-off Procedures.* The following procedures will govern the consideration of filings in this proceeding.

(a) Counterproposals advanced in this proceeding itself will be considered if advanced in initial comments, so that parties may comment on them in reply comments. They will not be considered if advanced in reply comments. *(See* Section 1.420(d) of the Commission's Rules.)

(b) With respect to petitions for rule making which conflict with the proposal(s) in this *Notice,* they will be considered as comments in the proceeding, and Public Notice to this effect will be given as long as they are filed before the date for filing initial comments herein. If they are filed later than that, they will not be considered in connection with the decision in this docket.

(c) The filing of a counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved.

4. *Comments and Reply Comments; Service.* Pursuant to applicable procedures set out in Sections 1.415 and 1.420 of the Commission's Rules and Regulations, interested parties may file comments and reply comments on or before the dates set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached. All submissions by parties to this proceeding or by persons acting on behalf of such parties must be made in written comments, reply comments, or other appropriate pleadings. Comments shall be served on the petitioner by the person filing the comments. Reply comments shall be served on the person(s) who filed comments to which the reply is directed. Such comments and reply comments shall be accompanied by a certificate of service. *(See* Section 1.420(a), (b) and (c) of the Commission's Rules.) Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554.

5. *Number of Copies.* In accordance with the provisions of Section 1.420 of the Commission's Rules and Regulations, an original and four copies of all comments, reply comments, pleadings, briefs, or other documents shall be furnished the Commission.

6. *Public Inspection of Filings.* All filings made in this proceeding will be available for examination by interested parties during regular business hours in the Commission's Public Reference Room at its headquarters, 1919 M Street N.W., Washington, D.C.

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 89-535

In the Matter of

Amendment of Section 73.202(b), RM-6980
Table of Allotments,
FM Broadcast Stations.
(Elizabeth City, North Carolina,
and Chesapeake, Virginia)

REPORT AND ORDER
(Proceeding Terminated)

Adopted: July 19, 1994; Released: July 27, 1994

By the Acing Chief, Allocations Branch:

1. At the request of Benchmark Radio Acquisition Fund IV Limited Partnership ("petitioner"),[1] licensee of Radio Station WKOC-FM (formerly WMYK(FM)), Channel 229C, Elizabeth City, North Carolina, the Commission has before it the *Notice of Proposed Rule Making*, 4 FCC Rcd 8313 (1989), proposing a change of community of license for Channel 229C from Elizabeth City to Chesapeake, Virginia. Petitioner filed comments reaffirming its intention to apply for the channel, if allotted to Chesapeake. Eure Communications, Inc. ("Eure"), filed opposing comments.[2] Goya Communications ("Goya") filed a counterproposal.[3]

2. *Comments.* Petitioner seeks the reallotment of Channel 229C from Elizabeth City, North Carolina, (population 14,292) to Chesapeake, Virginia, (population 151,976) and the modification of Station WKOC-FM's license accordingly.[4] Petitioner submits that Elizabeth City currently receives local transmission service from two AM stations, two FM commercial stations, and one noncommercial educational FM station.[5] In contrast, Chesapeake has one AM station and a noncommercial educational FM station. Petitioner states that because it proposes to operate from its present site, the requested change in community will cause no discernible alteration in the existing reception service of Station WKOC-FM.

3. Petitioner's request was filed in anticipation of the adoption of Section 1.420(i), which permits a licensee to request a change in community of license without facing competing expressions of interest. *See Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License* (*"Change of Community R&O"*), 4 FCC Rcd 4870 (1989), *recon. granted in part* (*"Change of Community MO&O"*), 5 FCC Rcd 7094 (1990). Our initial analysis of petitioner's proposal determined that Chesapeake is partially within the Norfolk-Virginia Beach-Newport News, Virginia, Urbanized Area ("Norfolk Urbanized Area").[6] In order to determine whether Chesapeake is deserving of a local service preference, or whether Chesapeake should be credited with all of the aural services licensed to the Norfolk Urbanized Area, we issued a *Request for Supplemental Information* (*"RSI"*), 7 FCC Rcd 6815 (1992). The *RSI* requested petitioner to direct its response to the factors for determining independence as enumerated in *RKO General, Inc. (KFRC)*, 5 FCC Rcd 3222 (1990), *vacated as moot pursuant to settlement*, 6 FCC Rcd 1808 (1991) (*"KFRC"*), and *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) (*"Tuck"*).[7] Petitioner

[1] A substitution of petitioner, by assignment of the license for WKOC-FM, Elizabeth City, North Carolina, from Edge Broadcasting Company to Benchmark Radio Acquisition Fund IV Limited Partnership, was granted March 5, 1993, and consummated May 28, 1993.

[2] Eure filed a motion to dismiss petitioner's rule making petition, and, subsequently, filed a petition to withdraw the motion. In compliance with Section 1.420 of the Commission's Rules, Eure stated that it has neither been promised, nor has it received, payment or other consideration in exchange for its withdrawal. Eure's request to withdraw its motion is granted. As a result, we dismiss as moot the various procedural motions filed by the parties respecting petitioner's above noted motions.

[3] Goya requests the allotment of Channel 229A at Tuckahoe, Virginia, as that community's first local service. Goya also requests the reallotment of Channel 229C at Elizabeth City to Chesapeake as Channel 229C2, and seeks to modify the authorization of Station WKOC-FM to specify Chesapeake as its community of license. Our review of Goya's counterproposal indicates that it is not acceptable for consideration, and therefore it has not been placed on public notice. Initially, we note that Goya's proposal would reduce the operating power of Station WKOC-FM, and Goya failed to submit petitioner's consent to a downgrade. In fact, petitioner has stated its objection to any proposal whose adoption would result in a downgrade of its station. Next, even if petitioner's consent were of record, the operation of Channel 229C2 at Chesapeake from the coordinates specified by Goya would fail to provide city grade coverage to the entire community of license, as required by Section 73.315 of the Commission's Rules. *See Greenwood, South Carolina*, 3 FCC Rcd 4108, *corrected*, 3 FCC Rcd 4374 (1988). Accordingly, the counterproposal will be dismissed.

[4] Population figures are taken from the 1990 U.S. Census.

[5] Additionally, Channel 271A is allotted to the hyphenated communities of Chesapeake-Portsmouth-Virginia Beach, Virginia. Fourteen applications were filed for the station; the Commission granted, ultimately, the application of Stacy C. Brody for a construction permit.

[6] The U.S. Census Bureau classifies Chesapeake as an "extended city" located partially within the Norfolk Urbanized Area. Chesapeake comprises 340.7 square miles and has a total population of 151,976. The portion of Chesapeake which is located within the Norfolk Urbanized Area is comprised of 142.1 square miles with a population of 146,415, or 96.3% of the total population.

[7] *KFRC* and *Tuck* clarified the type of evidence considered in determining whether a suburban community should be denied a first local service preference. First, the Commission examines "signal population coverage," *ie.*, the degree to which the proposed station could provide service not only to the suburban community, but also to the adjacent metropolis. Second, the Commission examines the size and proximity of the suburban community relative to the adjacent city, and whether the suburban community is within the Urbanized Area of the city. Third, the Commission examines the interdependence of the suburban community with the central city. *See KFRC*, 5 FCC Rcd at 3223; *Tuck*, 3 FCC Rcd at 5377-78.

and Tidewater Communications, Inc., ("Tidewater"), licensee of Station WNOR AM/FM, Norfolk, Virginia, filed comments and reply comments.[8]

4. Petitioner argues that Chesapeake merits a local service credit, and should not be credited with all of the aural services in the Norfolk Urbanized Area. In presenting its *KFRC/Tuck* analysis, petitioner argues that the first criterion, signal population coverage, is not relevant in this case, because Station WKOC-FM is not changing its transmitter site. As a result, petitioner submits, the station will serve the same area and population regardless of whether the proposal is adopted.

5. As to the second criterion, relative size and proximity of the community to the metropolis, we note that Chesapeake and Norfolk are adjacent communities. In this connection, the petitioner argues that the instant case is not a typical core city/suburban city situation, and that consequently this criterion is of marginal significance. Rather, petitioner submits that this case differs from *KFRC* and *Tuck* because Chesapeake is co-equal with and separate from the other communities in the Norfolk Urbanized Area, which includes Chesapeake, Norfolk (population 261,229), Virginia Beach (population 393,069), Portsmouth (population 103,907), Suffolk (population 52,141) and Newport News (population 170,045).[9] Petitioner argues that in *KFRC*, the Commission examined the independence of Richmond, California (population 74,676, according to the 1980 U.S. Census), a community in the San Francisco Urbanized Area (population 3,190,698), and in *Tuck*, the Commission examined several communities within the Dallas-Fort Worth Urbanized Area. According to petitioner, neither *KFRC* nor *Tuck* is analogous here inasmuch as each addressed competing proposals involving small suburban communities and a clearly central "core city". Petitioner also submits population information for the cities in the Norfolk Urbanized Area reflecting significant population growth in Chesapeake since 1980.[10] Therefore, according to petitioner, the evidence indicates that Chesapeake is not an appendage of any community in the Norfolk Urbanized Area.

6. With regard to the third criterion, petitioner urges that Chesapeake is an independent community, while Tidewater maintains that Chesapeake is interdependent with the Norfolk Urbanized Area. Both parties base their conclusions upon an analysis of the eight factors which the Commission has previously found relevant to a finding of interdependence, namely:

> (1) the extent to which community residents work in the larger metropolitan area rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether the community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries.[11]

As evidence that Chesapeake is an independent community, petitioner submits a publication entitled *Chesapeake, Virginia, 1992 - 1993 Economic Facts*, which contains information on population, income, education, and local government, an *Industrial Directory*, and a letter from the Mayor of the City of Chesapeake. In support of its position that Chesapeake is interdependent with the Norfolk Urbanized Area, Tidewater submits an engineering statement and a declaration from the Vice President of Tidewater Communications, Inc.

7. With respect to the first factor, petitioner notes that almost 40% of Chesapeake's work force of over 75,000 persons work in Chesapeake. Tidewater asserts that Chesapeake residents also work in Norfolk and Virginia Beach.

8. With respect to the second factor, the parties agree that Chesapeake does not have a daily newspaper published solely for Chesapeake, and that Norfolk's *Virginia Pilot/Ledger Star* is widely read in the community. Petitioner notes, however, that the *Virginia Pilot /Ledger Star* also publishes the *Chesapeake Clipper*, a substantial thrice-weekly tabloid supplement.[12] Petitioner adds that the weekly publication entitled *Chesapeake Post* carries "news and advertising of interest to Chesapeake residents only," and that several "shopper publications" are published in Chesapeake. As for other media, petitioner asserts that Chesapeake franchises a cable system with local access channels and advertising which serves only the City of Chesapeake, in addition to the community's AM station. Petitioner also notes that each community in the Norfolk Urbanized Area has previously been treated as an independent community for the licensing of stations. In opposition, Tidewater points to petitioner's concession that 33 radio stations provide service to Chesapeake.[13] Tidewater submits that the 30 commercial stations "place principal city contours over the community." Tidewater Comments of 12-14-92 at 6.

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[8] Tidewater challenges petitioner's comments on the ground that the pleading failed to include a table of contents and a summary, in compliance with Section 1.49 of our Rules. While Tidewater is correct, we do not believe that petitioner's failure to include this information merits dismissal of the pleading.

[9] Petitioner notes that Newport News is separated from the other communities in the Norfolk Urbanized Area by the James River.

[10] According to petitioner, Chesapeake had a 1980 U.S. Census population of 114,486 persons. Chesapeake's 1990 Census population is 151,976, reflecting a 33% population growth for the ten year period.

[11] *See KFRC*, 5 FCC Rcd at 3223; *Tuck*, 3 FCC Rcd at 5378.

[12] Tidewater submits that the "local tabloid" is actually included in the Chesapeake editions of the "regional Norfolk [Virginia Pilot/Ledger Star] newspaper." Tidewater Reply Comments at 4, n.3.

[13] Tidewater states that those services include Norfolk with 12 local stations (5 AM and 7 FM), Virginia Beach with 4 (1 AM and 3 FM), Portsmouth with 3 AM stations, Suffolk with 3 (1 AM and 2 FM) and Chesapeake with one daytime-only AM station.

9. With respect to factors 3 and 4, petitioner submits a letter from the Mayor of Chesapeake stating that Chesapeake is a "fully independent municipal corporation" and maintains its own police force, fire department and professional emergency services division. The Mayor also notes that Chesapeake's residents share familial, historical and commercial relationships with northeastern North Carolina which are not enjoyed by other Virginia communities. Both Petitioner and Tidewater state that Chesapeake has its own government, elected mayor, and city council. In contrast, Tidewater submits an affidavit from its Vice-President stating that most community leaders and residents of Chesapeake perceive the community as "an integral part of the Hampton Roads area, not separate from, the larger metropolitan area . . ." and that "some residents of Chesapeake think of themselves as living in Hampton Roads more than in Chesapeake." Tidewater's Comments of 12-14-92, Attachment 2.

10. As for factor 5, petitioner notes that two telephone companies serve the Norfolk Urbanized Area, one of which serves a wide area of Chesapeake and publishes a telephone directory including the area. Petitioner submits the covers of two telephone books which list Chesapeake among other communities. Tidewater urges that Chesapeake does not have its own, specific telephone directory. Petitioner also asserts that Chesapeake has several designated zip codes.

11. Regarding factor 6, petitioner states that the community has a wide variety of commercial establishments, with retail sales of $962,000,000 in 1991. Petitioner and Tidewater agree that Chesapeake has its own health facilities. Petitioner concedes that Chesapeake does not have an independent transportation system, but, like other communities in the Norfolk Urbanized Area, is served by the Tidewater Regional system.

12. As for factor 7, Tidewater submits that Chesapeake is part of the advertising market for the Norfolk Urbanized Area. Petitioner disagrees, asserting that the degree to which Chesapeake is part of a larger advertising market is unclear. However, based on a number of businesses such as automobile dealers which maintain facilities in Chesapeake as well as other communities in the Norfolk Urbanized Area, petitioner surmises the existence of a separate advertising market for Chesapeake.

13. With respect to factor 8, both parties note that Chesapeake has a full complement of municipal services. Petitioner states that Chesapeake has independent municipal services such as schools, a central library, a municipality operated water system, a police department, an independent telephone company, and an independent tax structure with local assessments and budgeting. In addition, petitioner asserts that the City of Chesapeake is the franchise authority for the cable system that serves only Chesapeake.

14. In its reply comments, Tidewater argues that petitioner's proposal offers minimal public interest benefits to offset the disruption of transmission service to Elizabeth City that would result from adoption of the proposal. It cites to *Brunswick and Waycross, GA*, 8 FCC Rcd 17 (1992), which denied a change of community that would produce no improvement in reception service, but would only change the designation of the community of license.

15. *Discussion.* Based on the foregoing facts, we conclude that grant of the petitioner's request would serve the public interest. We conclude that Chesapeake, while partially within the Norfolk Urbanized area, should be treated as sufficiently distinct from that area that the public interest benefits of a third local service outweigh disruption in existing local service caused by removing the local service to Elizabeth City.

16. We turn first to the three criteria enumerated in *KFRC* and *Tuck*. The first test is signal population coverage, *ie.*, the extent to which the proposed station could provide service not only to the suburban community, but also to the adjacent metropolis. From its existing transmitter site, petitioner serves not only 100% of Chesapeake, but also 85% of the total land area of the Norfolk Urbanized Area, and approximately 90% of the population of that urbanized area, *ie.*, some 1,190,788 people. While we disagree with petitioner's view that the criterion of signal population coverage is not relevant here in that no transmitter move is proposed, we agree that the factor has diminished significance for that reason, since the factor of signal population coverage would equally indicate that we should consider Elizabeth City as within the Norfolk Urbanized area.

17. With respect to the second criterion of relative size and proximity, we conclude that this factor supports treating Chesapeake as distinct from the larger Urbanized Area. Initially, we note that Chesapeake is directly adjacent to the communities of Portsmouth, Norfolk and Virginia Beach. Moreover, Chesapeake is almost entirely within the Norfolk Urbanized Area and that portion of its population within the Norfolk Urbanized Area (146,415 persons of 151,976 persons within Chesapeake) comprises 11% of the total population of 1,323,098 persons in the Norfolk Urbanized Area. However, we agree with petitioner that the instant case differs significantly from the fact situations addressed in *KFRC* and *Tuck* in that there is not one identifiably dominant community within the Urbanized Area. In our view, this distinction is critical to a realistic appraisal of the relationship between Chesapeake and the Norfolk Urbanized Area. Unlike the communities compared in *KFRC* and *Tuck*, Chesapeake cannot be said to be ancillary to a central metropolis, but rather is in itself a sizable, distinct community, located in an Urbanized Area composed of a number of similar communities. While the adjacent communities of Norfolk (population 261,229) and Virginia Beach (population 389,536) have populations larger than Chesapeake's population of 151,976, the populations of Portsmouth and Suffolk, respectively, are approximately two-thirds and one-third that of Chesapeake. In *KFRC*, by contrast, the community of Richmond was less than one-ninth that of the larger metropolis of San Francisco, while *Tuck* addressed communities only a fraction of the size of the Dallas-Fort Worth metropolitan area, and in both cases, it was readily determinable what community the "suburban" community should be considered proximate to. Accordingly, we conclude that the size and proximity factor weighs strongly in favor of considering Chesapeake distinct from the larger Urbanized Area.

18. As stated in *KFRC*, the showing required under the third criterion of "independence-interdependence between the smaller city and the central city of the metropolitan area" will vary depending on the degree to which the relative size and proximity of the two communities "suggests that the community is a mere appendage of the central city." 5 FCC Rcd at 3223, 3225 n.6. After reviewing the eight factors we have traditionally examined in making this determination, we conclude that the weight of the evidence indicates that Chesapeake is sufficiently independent from the Norfolk Urbanized Area to warrant treating it as distinct from that area.

19. Initially, we find that the evidence addressing two of the factors relevant to this criterion clearly supports a finding of independence. These are the existence of a local government with a mayor and city council (factor 4), and the existence of a full range of municipal services (factor 8).

20. The evidence on the remaining factors supports, on balance, a determination that Chesapeake is not so interdependent with the larger metropolitan area as to warrant treating it as indistinct from that area. With respect to factor 2, whether the community is served by other media or its own newspaper, we find it significant that although Chesapeake has no daily newspaper, it has a weekly newspaper, several other non-daily local publications, and the local daily newspaper publication of a Chesapeake tabloid supplement three times a week. The existence of the Chesapeake cable system also weighs against a finding of interdependence with the larger adjacent area. In contrast, the existence of Chesapeake's aural transmission services, namely, an AM radio station and an FM noncommercial-educational radio station, is countered somewhat by the fact that Chesapeake receives service from 34 stations licensed to communities in theh) Norfolk Urbanized Area. While tending to support a finding of interdependence, this factor is not conclusive. Under factor 5, whether the community has its own zip code or phone book, petitioner has established that Chesapeake has its own zip code(s). Petitioner's evidence, consisting of telephone directory cover pages reflecting service to Chesapeake as well as other areas (*eg.*, Princess Anne, Pungo, Norfolk, Portsmouth), fails to establish that Chesapeake has its own phone book. Nonetheless, the telephone book cover's listing of the contiguous communities, *ie.*, Norfolk, Portsmouth, Suffolk, Newport News and Chesapeake, with equal prominence, confirms that this case involves the somewhat unique situation in which no central city in the Urbanized Area can be identified.

21. The evidence respecting factor 6, whether the community has its own commercial establishments, health facilities, and transportation systems, supports, on balance, a conclusion that Chesapeake is significantly independent of the Urbanized Area. It is undisputed that Chesapeake has its own hospital and a wide range of commercial establishments. The fact that Chesapeake does not have its own independent public transportation system does not support a finding of interdependence in this case, because the Norfolk Urbanized Area shares one public transportation system. With respect to factor 3, whether community leaders and residents perceive the community as separate, although we have two opposing opinions on this issue, the opinion of the Mayor of Chesapeake militates against a finding of interdependence with the larger Urbanized Area, and we give it slightly greater weight than the opinions of Tidewater, licensee of a Norfolk station.

22. The remaining factors, on the other hand, would tend to indicate that Chesapeake is not independent of the Urbanized Area, were it not for the unique configuration of the Norfolk Urbanized Area. Factor 1, the extent to which community residents work in the larger urbanized area rather than the specified community, favors a finding of interdependence because, as petitioner concedes, less than 40% of Chesapeake residents work in Chesapeake. This figure is similar to figures for the suburban community of Richmond, California, addressed in *KFRC*. Additionally, no evidence was presented to support a finding under factor 7 of a separate Chesapeake advertising market.

23. While there is clearly some interdependence between Chesapeake and the larger Norfolk Urbanized Area, on balance, we find that the evidence presented with respect to the eight factors under the third criterion of *KFRC/Tuck* is sufficient, when viewed in combination with our conclusions respecting the first and second criteria, *ie.*, signal population coverage and location and proximity to the urbanized area, to overcome the presumption that Chesapeake should be treated as indistinct from the Norfolk Urbanized Area.

24. We find that the public interest would be served by reallotting Channel 229C from Elizabeth City, North Carolina, to Chesapeake, Virginia. Our analysis is based upon the transmission service gains and losses that would flow from the reallotment of the channel. Reception service is not an issue in this proceeding because Station WKOC-FM is not proposing to move its transmitter site, and a change of community of license will cause no discernible difference in the existing reception service. Adoption of this proposal would provide an additional aural transmission service to Chesapeake, a growing community of over 150,000, which currently has only one local AM station and a noncommercial educational FM station, while removing the fifth local transmission service from Elizabeth City, a community roughly one-tenth the size of Chesapeake. We believe the provision of competitive local radio service in the community of Chesapeake is warranted.

25. *Brunswick and Waycross, GA, supra,* cited by Tidewater as precedent requiring denial of petitioner's request, is inapposite. While that case, like the instant proposal, involved a proposed change in the community of license with no change in reception service, the communities involved in that case were substantially different than in this case. The petitioner in that case proposed to remove the sixth station from Waycross and move it to Brunswick, which also had six stations. Both communities had a population of approximately 16,400 persons. Given these circumstances, we concluded that the benefits of allowing the change were not sufficiently substantial to warrant disruption of existing service. In this case, by contrast, one community is over ten times larger than the other, and has significantly fewer stations licensed to it. Under these circumstances, the benefits of providing an additional service to Chesapeake substantially outweigh the disruption in local service in Elizabeth City.

26. Channel 229C can be allotted to Chesapeake, Virginia, in compliance with the Commission's minimum distance requirements at the licensed site of Station WKOC-FM. In accordance with the provisions of Section 1.420(i) of the Commission's Rules, we will modify the license for Station WKOC-FM to specify Chesapeake, Virginia, as its community of license on Channel 229C in lieu of its use at Elizabeth City, North Carolina.

27. Accordingly, pursuant to the authority contained in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204(b) and 0.283 of the Commission's Rules, IT IS ORDERED, That effective **August 10, 1994**, the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, IS AMENDED, with respect to the communities listed below, to read as follows:

City	Channel No.
Chesapeake, Virginia	229C
Elizabeth City, North Carolina	244A

28. IT IS FURTHER ORDERED, That, pursuant to Section 316(a) of the Communications Act of 1934, as amended, the license of Station WKOC-FM IS MODIFIED to specify operation on Channel 229C at Chesapeake, Virginia, in lieu of Elizabeth City, North Carolina, subject to the following conditions:

(a) Nothing contained herein shall be construed as authorizing any change in the license except the community, as specified above. Any other changes, except for those so specified under Section 73.1690 of the Rules, require prior authorization pursuant to an application for construction permit (FCC Form 301); and

(b) Program tests may be conducted in accordance with the provisions of Section 73.1620 of the Rules, PROVIDED the transmission facilities comply in all respects with its license except for the community as specified above and a license application (FCC Form 302) is filed within ten (10) days of commencement of program tests.

29. IT IS FURTHER ORDERED, That the petition for rule making submitted by Benchmark Radio Acquisition Fund IV Limited Partnership, to reallot Channel 229C from Elizabeth City, North Carolina, to Chesapeake, Virginia, IS GRANTED. The counterproposal filed by Goya Communications is DISMISSED.

30. IT IS FURTHER ORDERED, That this proceeding IS TERMINATED.

31. For further information concerning this proceeding, contact Sloan Gregory, or Pamela Blumenthal, Mass Media Bureau, (202) 634-6530.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Division

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 94-85

In the Matter of

Amendment of Section 73.202(b), RM-8482
Table of Allotments,
FM Broadcast Stations.
(Falmouth and Mashpee,
Massachusetts)

NOTICE OF PROPOSED RULE MAKING

Adopted: July 14, 1994; Released: July 28, 1994

Comment Date: September 19, 1994
Reply Comment Date: October 4, 1994

By the Acting Chief, Allocations Branch:

1. Before the Commission for consideration is a petition for rule making filed by J.J. Taylor Companies, Inc. ("Taylor"), licensee of Station WFAL(FM), Channel 266A, Falmouth, Massachusetts, requesting the reallotment of its channel to Mashpee, Massachusetts, and modification of its license accordingly.

2. Taylor seeks to invoke the provisions of Section 1.420(i) of the Commission's Rules. Taylor advises that the requested allotment to Mashpee is mutually exclusive with the existing allotment of Channel 266A at Falmouth. In support of its request, Taylor states that Station WFAL(FM)'s present facilities (3.7kw ERP at 77m HAAT) are substantially less than the maximum facilities for Class A FM stations due to the protection that must be provided to Station WGIR-FM, Manchester, New Hampshire, Station WWBB, Providence, Rhode Island, and Station WZLX, Boston, Massachusetts. According to Taylor, a considerable area exists from which Station WFAL(FM) can serve Mashpee with full Class A FM facilities and provide the requisite city grade service. Taylor adds that Falmouth (population 4,047)[1] has another FM station. [2] Thus, Taylor's proposal would bring a first local service to Mashpee (population 7,884) and would not deprive Falmouth of its local service.

3. Based on the information before us, we are unable to determine whether Taylor's proposal would result in a preferential arrangement of allotments. We note that Mashpee is partially within the Hyannis Urbanized Area as defined by the United States Census.[3] We question whether Mashpee is deserving of a first local FM service preference, or whether Mashpee should be credited with the aural services licensed to the Hyannis Urbanized Area.[4] Taylor is requested to submit information sufficient to show that Mashpee is deserving of such a preference as well as any other information regarding the public interest benefits of this proposal. *See Amendment of the Commission's Rules Regarding Modification of FM & TV Authorizations to Specify a New Community of License (Memorandum Opinion and Order)*, 5 FCC Rcd 7094 (1990). We note that a staff engineering analysis indicates that Channel 266A could be site restricted at Falmouth and operate as a six kilowatt facility without changing its community of license at coordinates 41-32-55 and 70-35-15. At that site, city grade coverage will also be provided to Mashpee. Further, from Taylor's proposed site for Channel 266A at Mashpee, city grade coverage will be provided to the entire community of Falmouth.

4. We believe the public interest could be served by proposing to reallot Channel 266A from Falmouth to Mashpee, Massachusetts, if Mashpee is found to be deserving of a first local FM preference. Therefore, we shall propose to modify Station WFAL(FM), as requested, to specify Mashpee as its community of license. A staff analysis indicates that Channel 266A can be allotted to Mashpee in conformity with the Commission's rules and regulations at Taylor's specified site.[5] From that site, city grade service will also be provided to the entire community of Falmouth. Further, both the loss area of Falmouth and the gain area of Mashpee are completely covered by five or more full-time reception services and are, therefore, considered to be well-served areas. The loss area of Falmouth contains 11,809 people and covers approximately 90 square kilometers (34.8 square miles) and the gain area of Mashpee contains 54,183 people and covers approximately 202 square kilometers (78 square miles). In accordance with the provisions of Section 1.420(i) of the Commission's Rules, we shall not accept competing expressions of interest or require that the petitioner demonstrate the availability of an additional channel at Mashpee.

5. Accordingly, we seek comments on the proposed amendment of the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, for the community listed below, to read as follows:

	Channel No.	
City	Present	Proposed
Falmouth, Massachusetts	266A, 270B	270B
Mashpee, Massachusetts	---	266A

6. The Commission's authority to institute rule making proceedings, showings required, cut-off procedures, and filing requirements are contained in the attached Appendix and are incorporated by reference herein. In particular, we note that a showing of continuing interest is required by paragraph 2 of the Appendix before a channel will be allotted.

[1] Population figures are taken from the 1990 U.S. Census.
[2] Station WCIB, Channel 270B, is licensed to Falmouth.
[3] According to the 1990 U.S. Census, 1,928 of Mashpee's 7,884 residents are included within the Hyannis Urbanized Area.
[4] FM Stations WPXC, Channel 275A, and WCOD-FM, Channel 291B, are licensed to Hyannis, Massachusetts. There are no AM stations allotted to Hyannis.
[5] The coordinates for Channel 266A at Mashpee are 41-34-45 and 70-30-45.

7. Interested parties may file comments on or before **September 19, 1994**, and reply comments on or before **October 4, 1994**, and are advised to read the Appendix for the proper procedures. Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554. Additionally, a copy of such comments should be served on the petitioner's counsel, as follows:

Joseph A. Belisle
Leibowitz & Associates
One S.E. Third Avenue, Suite 1450
Miami, Florida 33131

8. The Commission has determined that the relevant provisions of the Regulatory Flexibility Act of 1980 do not apply to rule making proceedings to amend the FM Table of Allotments, Section 73.202(b) of the Commission's Rules. See *Certification that Sections 603 and 604 of the Regulatory Flexibility Act Do Not Apply to Rule Making to Amend Sections 73.202(b), 73.504 and 73.606(b) of the Commission's Rules*, 46 FR 11549, February 9, 1981.

9. For further information concerning this proceeding, contact Kathleen Scheuerle, Mass Media Bureau, (202) 634-6530. For purposes of this restricted notice and comment rule making proceeding, members of the public are advised that no *ex parte* presentations are permitted from the time the Commission adopts a Notice of Proposed Rule Making until the proceeding has been decided and such decision is no longer subject to reconsideration by the Commission or review by any court. An *ex parte* presentation is not prohibited if specifically requested by the Commission or staff for the clarification or adduction of evidence or resolution of issues in the proceeding. However, any new written information elicited from such a request or a summary of any new oral information shall be served by the person making the presentation upon the other parties to the proceeding unless the Commission specifically waives this service requirement. Any comment which has not been served on the petitioner constitutes an *ex parte* presentation and shall not be considered in the proceeding. Any reply comment which has not been served on the person(s) who filed the comment, to which the reply is directed, constitutes an *ex parte* presentation and shall not be considered in this proceeding.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

APPENDIX

1. Pursuant to authority found in Sections 4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61 0.204(b) and 0.283 of the Commission's Rules, IT IS PROPOSED TO AMEND the FM Table of Allotments, Section 73.202(b) of the Commission's Rules and Regulations, as set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached.

2. *Showings Required.* Comments are invited on the proposal(s) discussed in the *Notice of Proposed Rule Making* to which this Appendix is attached. Proponent(s) will be expected to answer whatever questions are presented in initial comments. The proponent of a proposed allotment is also expected to file comments even if it only resubmits or incorporates by reference its former pleadings. It should also restate its present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly. Failure to file may lead to denial of the request.

3. *Cut-off Procedures.* The following procedures will govern the consideration of filings in this proceeding.

(a) Counterproposals advanced in this proceeding itself will be considered if advanced in initial comments, so that parties may comment on them in reply comments. They will not be considered if advanced in reply comments. (*See* Section 1.420(d) of the Commission's Rules.)

(b) With respect to petitions for rule making which conflict with the proposal(s) in this *Notice*, they will be considered as comments in the proceeding, and Public Notice to this effect will be given as long as they are filed before the date for filing initial comments herein. If they are filed later than that, they will not be considered in connection with the decision in this docket.

(c) The filing of a counterproposal may lead the Commission to allot a different channel than was requested for any of the communities involved.

4. *Comments and Reply Comments; Service.* Pursuant to applicable procedures set out in Sections 1.415 and 1.420 of the Commission's Rules and Regulations, interested parties may file comments and reply comments on or before the dates set forth in the *Notice of Proposed Rule Making* to which this Appendix is attached. All submissions by parties to this proceeding or by persons acting on behalf of such parties must be made in written comments, reply comments, or other appropriate pleadings. Comments shall be served on the petitioner by the person filing the comments. Reply comments shall be served on the person(s) who filed comments to which the reply is directed. Such comments and reply comments shall be accompanied by a certificate of service. (*See* Section 1.420(a), (b) and (c) of the Commission's Rules.) Comments should be filed with the Secretary, Federal Communications Commission, Washington, D.C. 20554.

5. *Number of Copies.* In accordance with the provisions of Section 1.420 of the Commission's Rules and Regulations, an original and four copies of all comments, reply comments, pleadings, briefs, or other documents shall be furnished the Commission.

6. *Public Inspection of Filings.* All filings made in this proceeding will be available for examination by interested parties during regular business hours in the Commission's Public Reference Room at its headquarters, 1919 M Street N.W., Washington, D.C.

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 93-72

In the Matter of

Amendment of Section 73.202(b), RM-8154
Table of Allotments,
FM Broadcast Stations.
(Ridgecrest and Lenwood, California)

REPORT AND ORDER
(Proceeding Terminated)

Adopted: July 21, 1994; Released: July 28, 1994

By the Acting Chief, Allocations Branch:

1. The Commission considers herein the *Notice of Proposed Rule Making*, 8 FCC Rcd 2249 (1993), issued in response to a petition filed by Roy William Mayhugh, tr/as KLOA Radio ("petitioner"), licensee of Station KLOA-FM, Channel 285A, Ridgecrest, California, proposing the substitution of Channel 285B1 for Channel 285A and modification of its license accordingly. Additionally, to accommodate the proposal, petitioner requested the substitution of Channel 283A for Channel 285A at Lenwood, California, and modification of the authorization issued to Eneida Orchard ("Orchard") for Station KIQQ-FM.[1] [2] Petitioner filed supporting comments reiterating an intention to apply for Channel 285B1 if allotted to Ridgecrest, as requested.[3]

2. We believe the public interest would be served by granting petitioner's modification request. Therefore, we will substitute Channel 285B1 for Channel 285A at Ridgecrest since it will afford petitioner greater flexibility in site selection and enable Station KLOA-FM to expand its coverage area. Additionally, we will substitute Channel 283A for Channel 285A at Lenwood to accommodate petitioner's proposal. The substitution at Lenwood will afford Station KIQQ-FM an opportunity to operate at maximum Class A facilities, a benefit not presently available to it.

3. As stated in the *Notice*, Channel 285B1 can be allotted to Ridgecrest at the petitioner's suggested site, located 4.5 kilometers (2.8 miles) east of the community at coordinates 35-36-27 and 117-37-29. Channel 283A can be allotted to Lenwood at the site specified for Station KIQQ-FM at coordinates 34-51-20 and 117-02-57. As Lenwood is located within 320 kilometers (199 miles) of the Mexican border, concurrence of the Mexican government in this proposal was obtained.

4. In accordance with the provisions of Section 1.420(g) of the Commission's Rules, we are modifying herein the license of Station KLOA-FM to specify operation on Channel 285B1 in lieu of Channel 285A at Ridgecrest. Additionally, since Orchard has consented to change the frequency of operation for Station KIQQ-FM, we are also modifying the construction permit therefor to specify Channel 283A in lieu of Channel 285A at Lenwood.

5. Commission policy requires reimbursement to affected licensees or permittees for reasonable costs associated with changing frequencies. *See, Circleville, Ohio*, 8 FCC 2d 159 (1967). Petitioner has stated its intention to reimburse Station KIQQ-FM for the reasonable costs related to the Class A frequency change at Lenwood.

6. Accordingly, pursuant to the authority contained in Sections4(i), 5(c)(1), 303(g) and (r) and 307(b) of the Communications Act of 1934, as amended, and Sections 0.61, 0.204(b) and 0.283 of the Commission's Rules, IT IS ORDERED, That effective **September 12, 1994**, the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, IS AMENDED with respect to the communities listed below, as follows:

City	Channel No.
Ridgecrest, California	224B1, 285B1
Lenwood, California	245A, 283A, 297A

7. IT IS FURTHER ORDERED, That pursuant to Section 316(a) of the Communications Act of 1934, as amended, the license of KLOA Radio (File No. BLH-790226AF) for Station KLOA-FM, IS MODIFIED to specify operation on Channel 285B1 in lieu of Channel 285A, subject to the following conditions:

(a) Within 90 days of the effective date of this *Order*, the licensee shall submit to the Commission a minor change application for a construction permit (Form 301), specifying the new facility;

(b) Upon grant of the construction permit, program tests may be conducted in accordance with Section 73.1620; and

(c) Nothing contained herein shall be construed to authorize a change in transmitter location or to avoid the necessity of filing an environmental assessment pursuant to Section 1.1307 of the Commission's Rules.

---

[1] The construction permit issued to Orchard for Station KIQQ-FM (File No. BPH-880714NP) was cancelled and the call letters deleted by staff letter on February 8, 1994. Orchard subsequently filed a Form 307 application (File No. BPH-940321JB), to replace the expired construction permit, which is being treated as a petition for reconsideration of the Commission's dismissal action.

[2] As announced in the *Notice*, it was unnecessary to issue an *Order to Show Cause* to Station KIQQ-FM since petitioner's proposal included a letter from Orchard consenting to the proposed frequency change at Lenwood.

[3] As stated in the *Notice*, petitioner's request, although signed and an address provided, did not verify the statements contained in the petition, as required by Section 1.52 of the Commission's Rules. Petitioner was requested to correct the deficiency in its responsive comments, and has complied accordingly.

8. IT IS FURTHER ORDERED, That pursuant to Section 316(a) of the Communications Act of 1934, as amended, the authorization of Eneida Orchard for Station KIQQ-FM, Lenwood, California, IS MODIFIED to specify operation on Channel 283A in lieu of Channel 285A, subject to the following conditions:

(a) Nothing contained herein shall be construed as authorizing any change in Station KIQQ-FM's authorization, except the channel as specified above. Any other changes, except those so specified under Section 73.1690 of the Rules, require prior authorization pursuant to an application for a construction permit (FCC Form 301).

(b) Program tests may be conducted in accordance with the provisions of Section 73.1620 of the Rules, PROVIDED the transmission facilities comply in all respects with its authorization, except for the channel as specified above, and a license application (FCC Form 302) is filed within 10 days of commencement of program tests.

9. Pursuant to Commission Rule Section 1.1104(1)(k) and (2)(k), any party seeking a change in community of license of an FM or television allotment or an upgrade of an existing FM allotment, if the request is granted, must submit a rule making fee when filing its application to implement the change in community of license and/or upgrade. As a result of this proceeding, Roy William Mayhugh, tr/as KLOA Radio, licensee of Station KLOA-FM, is required to submit a rule making fee in addition to the fee required for the applications to effectuate the upgrade at Ridgecrest.

10. IT IS FURTHER ORDERED, That the Secretary of the Commission SHALL SEND a copy of this *Report and Order* by Certified Mail, Return Receipt Requested, to Eneida Orchard, Radio Station KIQQ-FM, 11920 Hesperia Road, Hesperia, California 92345.

11. IT IS FURTHER ORDERED, That this proceeding IS TERMINATED.

12. For further information concerning the above, contact Nancy Joyner, Mass Media Bureau, (202) 634-6530.

FEDERAL COMMUNICATIONS COMMISSION

John A. Karousos
Acting Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

LETTER
July 13, 1994

Released: July 28, 1994

Michael B. Milsom, Esquire
Vice President and General Counsel
American Radio Systems License Corp.
40 Beach Street
Manchester, MA 01944

IN REPLY REFER TO:
8310-GU
93101149
94020103
94021234

Dear Mr. Milsom:

This is in reference to a complaint by Maria Tavla alleging that Radio Station WRKO, Boston, MA, violated Section 73.1216 of the Commission's Rules concerning license-conducted contests.

Specifically, Ms. Tavla stated that on December 20, 1992, WRKO conducted a charity contest on the Paul Parent Gardening Show, in which WRKO's announcer offered a "Day of Landscaping" at the homes of the two top donors. Chosen the second top donor, Ms. Tavla described her unsuccessful efforts to collect her prize until she filed her complaint with us in October 1993.

In response to our letter of inquiry, you acknowledge that Mr. Parent offered his services as a gardening expert to the highest two contributors to the Salvation Army during a fundraising effort, but you explain that this offer was spontaneous and not approved in advance by station management. Nevertheless, you state, WRKO relied on Mr. Parent personally to fulfill his commitment, and when he did not do so in a timely fashion, WRKO reimbursed Ms. Tavla in an amount equal to her original donation. Ms. Tavla confirms that she received such check from WRKO.

You state that you accept full responsibility for the content of the WRKO broadcast, and you indicate that you have admonished Mr. Parent for his failure to follow through on his offer of services in a timely manner. You state that WRKO has further reiterated the station policy that management must approve all contests prior to broadcast, and that these policies will continue to be stated to all of the station's sales and programming personnel.

Section 73.1216 of the Commission's Rules states, in part, a licensee shall conduct the contest substantially as announced or advertised. It appears that WRKO violated Section 73.1216 of the Commission's Rules by failing to award the prize to Ms. Tavla as announced. Not until the Commission intervened was the matter finally resolved, by reimbursing Ms. Tavla in the amount of her donation. Accordingly, you are hereby ADMONISHED for this violation. Although no further Commission action is believed to be warranted at this time, you are expected to ensure that in the future WRKO complies with the requirements of Section 73.1216 of the Commission's Rules.

You are cautioned that future violations could result in the imposition of more severe administrative sanctions including monetary forfeiture. This letter and all related correspondence will be made part of Station WRKO's permanent file.

Sincerely,

Norman Goldstein, Chief
Complaints and Investigations Branch
Enforcement Division
Mass Media Bureau

cc: Ms. Tavla

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Amendment of Parts 0 and 19
of the Commission's Rules of
Commission Organization
and Governing Employee Standards
of Ethical Conduct

ORDER

Adopted: July 20, 1994; Released: July 28, 1994

By the Commission:

1. On February 3, 1993, regulations of the Office of Government Ethics (OGE) that establish new uniform standards of ethical conduct for officers and employees of the executive branch of the Federal Government became effective. *See* 5 C.F.R. 2635, 57 Fed. Reg. 35006 (1992).[1] OGE regulations also require the Commission to formally designate an agency official to be the "designated agency ethics official" or "DAEO" to coordinate and manage the Commission's ethics program. In addition, these regulations require the agency to appoint an alternate DAEO or "ADAEO" to serve in an acting capacity in the absence of the primary designated agency ethics official. *See* 5 C.F.R. §§ 2638.201-2638.202. The purpose of this Order is to designate personnel in the Office of General Counsel to those positions and to make the necessary changes in the Commission's rules to effect that designation. Specifically, this Order delegates authority to the General Counsel to assume the responsibilities of the DAEO and to implement the ethics program established in the new OGE regulations.

2. Under the OGE regulations, the DAEO is required to be qualified to counsel agency personnel concerning the new OGE ethics standards and to counsel departing and former agency officials on post-employment conflict of interest standards. 5 C.F.R. § 2638.202(b)(3)-(4). In addition, the DAEO has responsibility for managing the agency's ethics program, including liaison with OGE, reviewing financial disclosure reports, monitoring ethics training, and monitoring administrative actions and sanctions. The DAEO may appoint "deputy" ethics officials to perform any of these functions, but such deputies work under the DAEO's supervision. *See* 5 C.F.R. § 2638.204.

3. Under current Commission rules, the General Counsel has broad delegated authority to provide ethics counseling, and other duties that are very similar to the principal functions performed by the DAEO under OGE's regulations. Specifically, the General Counsel now has overall delegated authority to act as "legal counselor for the Commission to provide guidance on matters relating to ethical conduct," and to serve as the "Commission's designee to the Office of Personnel Management" on matters covered by the OPM (now OGE) rules governing ethical conduct. 47 C.F.R. § 19.735-105(a)(1). In fact, most of the responsibilities set forth in the OGE regulations, with the exception of the management of the financial disclosure statements, are already delegated to the Commission's General Counsel.[2] Our informal survey of other agencies also indicates that designating the senior legal official as the DAEO is consistent with the general practice of agencies of similar size. In light of these factors, we think it is appropriate to designate the General Counsel as the DAEO.

4. Accordingly we shall add a new section 0.251(a) to delegate authority to the General Counsel to act as the "designated agency ethics official." The rule will delegate authority to the Associate General Counsel for Administrative Law to act as the "alternate designated agency ethics official."[3]

5. The amendments adopted in this Order are rules of agency organization and therefore the Administrative Procedure Act's prior notice and effective date requirements do not apply. 5 U.S.C. § 553(b)(3)(A). Authority for the amendments adopted herein is contained in sections 4(i) and 5(c)(1) of the Communications Act. 47 U.S.C. 154(j) and 155(c)(1).

6. IT IS ORDERED, effective July 20, 1994, that Part 0 of the Rules and Regulations is amended as set forth in Appendix A.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

[1] Under the scheme established in the new OGC regulations, most of the Commission's existing Part 19 rules have been superseded by OGE's regulations. We will restructure Part 19 to remove the superseded sections and to renumber the provisions that may be retained in accordance with the OGE regulations in a future order.

[2] The current Commission rules give the Chief, Operations Support Division authority to serve as the designated agency ethics official for the purpose of receiving, reviewing and certifying financial disclosure statements. *See* 47 C.F.R. § 0.231(h).

[3] A conforming amendment will be made to section 0.231(h), 47 C.F.R. § 0.231(h).

APPENDIX A

Title 47 of the Code of Federal Regulations, Part O, is amended as follows:

Part O

1. Authority for Part O of Title 47 of the Code of Federal Regulations continues to read as follows:

Sec. 5, 48 Stat. 1068, as amended; 47 U.S.C. 155

2. Section 0.231 is amended by removing section (h).

3. Section 0.251 is amended by adding section (a) to read as follows:

§0.251 Authority Delegated

(a) The General Counsel is delegated authority to act as the "designated agency ethics official." The Associate General Counsel for Administrative Law is delegated authority to act as the "alternate designated agency ethics official."

* * * * *

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: July 28, 1994

COMMENTS SOUGHT ON ALASCOM, INC
ACCOUNT REDUCTIONS
CC DOCKET NO. 83-1376, RM 4436
AAD 94-75

Comment Date: September 2, 1994
Reply Date: September 16, 1994

On May 24, 1994, the Commission released an order that required Alascom, Inc. ("Alascom") to provide its telecommunications plant-in-service ("plant") and related accumulated depreciation reserve ("reserve") balances for each account as of March 30, 1994. Memorandum Opinion and Order, CC Docket No. 83-1376, RM 4436, FCC 94-116, released May 24,1994 (*Order*). The *Order* also required Alascom to file a detailed proposal for the specific plant account reductions it would make based on the first of two $75 million payments from AT&T.

On July 1, 1994, Alascom submitted its plant and reserve balances as of March 30, 1994 to the Commission. Alascom also submitted its detailed proposal for the plant account reductions to reflect the initial $75 million payment from AT&T. Alascom proposed to increase the reserve associated with its Digital Switching Equipment investment, Account 2212, so that this reserve balance will equal its corresponding plant balance. It also proposed to prorate the remainder of the $75 million to other reserve balances based upon the products of their net book balances and their remaining life estimates.

On July 8, 1994, the Chief of the Accounting Systems Branch, Accounting and Audits Division, issued a letter that directed Alascom to write-down the plant balances, not increase the related reserve balances. In addition, the letter directed Alascom to allocate the remainder using a proration based on the net book costs, not the product of the net book costs and the remaining life estimates. These directions were to be followed until the Bureau resolves the accounting issues pursuant to this public notice. Also, Alascom was directed to provide, on or before July 15, 1994, a listing of all plant and reserve balances, before and after the accounting entries described in the July 8, 1994 letter. On July 15, 1994, Alascom filed the necessary account balances.

Parties may file comments on Alascom's filings and on the letter from the Chief, Accounting Systems Branch on or before **September 2, 1994**, and reply comments may be filed on or before **September 16, 1994** with the Secretary, Federal Communications Commission, 1919 M Street, N.W., Room 222, Washington, D.C. 20554. Comments should reference AAD 94-75. Six (6) copies of each pleading should be sent to Kenneth M. Ackerman, Chief, Accounting Systems Branch, Common Carrier Bureau, 2000 L Street, N.W., Room 812, Washington, D.C. 20554, and one (1) copy of each pleading should also be sent to International Transcription Service (ITS), 2100 M Street, N.W., Suite 140, Washington, D.C. 20037, (202) 857-3600. Copies of Alascom's filing, the July 8, 1994 letter from the Chief, Accounting Systems Branch, and the July 15, 1994 response letter from Alascom are available for public inspection and copying in the Accounting and Audits Division's public reference room, 2000 L Street, N.W., Room 812, Washington, D.C. Copies are also available from ITS.

This a non-restricted proceeding. *Ex parte* presentations are permitted, except during the Sunshine Agenda period, provided they are disclosed as provided in Commission rules. See generally, 47 C.F.R. §§1.1200-1.1216. For further information, contact Kenneth M. Ackerman at (202) 634-1861.

FEDERAL COMMUNICATIONS COMMISSION

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

ALLTEL TELEPHONE COMPANIES — AAD 94-64

Request for Waiver of the Amortization Methodology Requirement

MEMORANDUM OPINION AND ORDER

Adopted: July 22, 1994; Released: July 28, 1994

By the Chief, Accounting and Audits Division:

I. INTRODUCTION

1. On April 29, 1994, ALLTEL Service Corporation and its telephone operating affiliates ("ALLTEL") filed a petition for waiver requesting permission to use an amortization method that is different from the one prescribed for individual items of furniture and certain other tools and equipment in the Commission's *Reconsideration Order* in CC Docket 87-135.[1] For the reasons discussed in the succeeding paragraphs, we grant ALLTEL's request.

II. BACKGROUND

2. On July 22, 1988, the Commission issued a *Report and Order* that raised the dollar limit for carriers to expense individual items of furniture and certain other tools and equipment from $200 to $500. In petitions for reconsideration, several parties urged the Commission to allow the amortization of the investment in items costing between $200 and $500 that had been capitalized prior to raising the expense limits over the prescribed average remaining depreciation lives of the items. On reconsideration, the Commission required that the investment in these items be segregated and amortized over an eight-year period. The *Reconsideration Order* also prescribed the method to be used to amortize the undepreciated investment in these items.[2]

3. The method prescribed in the *Reconsideration Order* requires monthly credits to the asset account subsidiary records and monthly debits to the accumulated depreciation subsidiary records to amortize the embedded asset investment and the associated accumulated depreciation. The amounts are determined by dividing the subsidiary record balances by the number of months remaining in the amortization period. The difference between the monthly asset investment amortized and the monthly accumulated depreciation amortized is charged to Account 6565, Amortization Expense-Other.[3]

4. In the *GTE Waiver Order*,[4] the Common Carrier Bureau ("Bureau") granted the GTE carriers permission to use an alternative amortization methodology for items costing between $200 and $500 that had been capitalized prior to the changes in expense limits. Under this methodology, the net book value of the segregated investment (asset cost less accumulated depreciation) is amortized over the eight-year amortization period by monthly credits to the accumulated depreciation accounts and monthly debits to the applicable amortization expense account. The Bureau found that this methodology produced the same results as the amortization methodology prescribed in the *Reconsideration Order*.[5]

III. SUMMARY OF PETITION

5. In its petition for waiver, ALLTEL states that in November 1993 it acquired all of GTE's telephone operations in Georgia. ALLTEL seeks permission to apply the amortization methodology the Commission authorized for GTE to those operations and to ALLTEL's other operations in Georgia. ALLTEL states that the requested waiver is necessary because, as a result of the Commission's granting the waiver of the amortization requirements, the GTE carriers did not maintain the accounting records necessary to implement the amortization methodology adopted by the Commission in its *Reconsideration Order*. Consequently, ALLTEL claims, these carriers lack the data necessary to use that methodology. ALLTEL further states that its use of the method previously approved for GTE would minimize ALLTEL's regulatory burdens without changing amortization results.

IV. DISCUSSION

6. We find that the GTE method produces the same results as that prescribed in the *Reconsideration Order*. We also find that it would not serve any useful purpose to require ALLTEL to comply with the literal instructions of the *Reconsideration Order* and that compliance with that method by the ALLTEL telephone companies operating in Georgia would be unduly burdensome. Therefore, we will permit those companies to use the GTE method. However, we emphasize that this waiver applies only to the current Georgia properties of ALLTEL and only as long as ALLTEL continues to own those properties.

V. ORDERING CLAUSE

7. Accordingly, IT IS ORDERED that the Request for Waiver filed April 29, 1994, by ALLTEL Service Corporation and its telephone operating affiliates IS GRANTED.

---

[1] Revision to Amend Part 31, Uniform System of Accounts for Class A and Class B Telephone Companies as it Relates to the Treatment of Certain Individual Items of Furniture and Equipment Costing $500 or Less, 3 FCC Rcd 4464 (1988) (*Report and Order*) *recon.*, 4 FCC Rcd 8229 (1989) (*Reconsideration Order*).

[2] *Reconsideration Order*, 4 FCC Rcd at 8230.

[3] *Id.*

[4] GTE Telephone Companies, Request for Waiver of Amortization Methodology Requirement, 5 FCC Rcd 4573 (Com. Car. Bur. 1990) (*GTE Waiver Order*).

[5] *Id.* at 4573.

FEDERAL COMMUNICATIONS COMMISSION

Kenneth P. Moran
Chief, Accounting and Audits Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In re Application of

VIRGINIA COMMUNICATIONS, INC. File No. 50206-CM-MP-93

For Authorization in the Multipoint Distribution Service and for Waiver of the Commission's Rules to Authorize Use of Channel 2 at Station WKR65 in Las Vegas, NV

MEMORANDUM OPINION AND ORDER

Adopted: July 7, 1994; Released: July 29, 1994

By the Chief, Domestic Facilities Division:

1. Virginia Communications, Inc. (VCI) has filed the captioned application requesting authority to modify its license for Multipoint Distribution Channel 2A (2156-2160 MHz) at Station WKR65 at Las Vegas, Nevada to operate on Multipoint Distribution Service (MDS) Channel 2 (2156-2162 MHz).

2. In support of its request, VCI states that station WKR65 is used as part of an existing wireless cable system serving Las Vegas. VCI argues that the operator's ability to use an additional channel for video entertainment will enhance its competitive prospects vis-a-vis the local cable company, and that the Commission's policies support such competition. VCI states that its proposed modification, if implemented, will result in no interference to point-to-point microwave radio stations, and that, in fact, the only point-to-point microwave radio licensee with authority to use this frequency band in the Las Vegas area has agreed to VCI's proposal to modify its authorization. VCI cites Section 21.19 of the Commission's rules and *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969) in support of its arguments.

3. Alternatively, VCI, citing *Big Bend Telephone Co.*, 2 FCC Rcd 2413, 2414 (1986), also argues that this type of waiver will be granted where a) the existing frequency allocation is not suited or is insufficient to accommodate the applicant's requirements; b) the frequencies are underutilized; c) the proposed use of the frequencies will not be detrimental to their assigned users; and d) the public interest will be served by grant of the waiver.

Discussion

4. Section 21.19 of the Commission's rules provides in pertinent part:

> Waivers of these rules may be granted upon application or on the Commission's own motion. A request for waiver shall contain a statement of reasons sufficient to justify a waiver. A waiver will not be granted except upon affirmative showing that:
>
> (a) The underlying purpose of the rule will not be served, or would be frustrated, by its application in the particular case, and that grant of the waiver is otherwise in the public interest. . . . Applicants must also show the lack of a reasonable alternative.

5. *WAIT Radio* provides that a waiver of a general rule may be granted if the public interest is served by a new service that will not undermine the public interest concerns represented by the general rule. *Id* at 1157. The public interest concerns supporting grant of a waiver include consideration of hardship, equity, or more effective implementation of overall policy. *Id* at 1159.

6. VCI meets the standards of a waiver under our rules and *WAIT Radio*.[1] We find that the underlying purpose and public interest concerns of the rule would not be served by its enforcement in this instance, and that the public interest would be served by granting the request. The underlying purpose of the rule is to ensure primary point-to-point use of the spectrum. However, Centel Telephone Company (Centel), the only licensee for the spectrum within VCI's service area, has agreed that VCI may use the channel and that VCI's use of the channel will not cause interference to Centel's operations. Accordingly, it is unnecessary for us to apply the rule in this instance.

7. Moreover, there is no reasonable alternative to making a full video channel for Channel 2A except authorizing use of Channel 2. No other spectrum would be suitable to expand the channel capacity, nor is there any equipment which could use any other spectrum to make up a complete video channel for Channel 2A.

8. Finally, the public interest is served by grant of the waiver. VCI will be able to offer another full-service video distribution channel to its system, which, it argues, will help it compete against the incumbent franchised cable operator. Competition for cable service is a public policy. *Cable Act of 1992*, Pub. L. No. 102-385, 106 Stat. 1460 (1992). The Commission has previously found it in the public interest to "enhance[] the viability of wireless cable service and its stature as a competitive force in the multichannel video delivery marketplace." *Wireless Cable Order*, 5 FCC Rcd 6410, at 6411 (1990).

9. Accordingly, we find it to be in the public interest to authorize VCI to use Channel 2, rather than Channel 2A. However, because VCI's request for authorization to use Channel 2 was filed after January 16, 1992, its use of Channel 2 frequencies is on a secondary basis, pursuant to *Redevelopment of Spectrum to Encourage Innovation in the use of New Telecommunications Technologies*, Third Report and Order and Memorandum Opinion and Order, (ET Docket No. 92-9, RM-7981, RM-8004) 8 FCC Rcd 6589 (1983).

[1] Since we find that VCI meets our standard for waiver in this instance, we need not reach its argument that the standards enunciated in *Big Bend, supra*, apply here.

ORDERING PARAGRAPHS

10. WHEREFORE, for the foregoing reasons, IT IS HEREBY ORDERED, pursuant to Section 316(a) of the Communications Act, as amended, that the license of MDS Station WKR65 at Las Vegas, Nevada, IS MODIFIED to specify use of Channel 2, at 2156-2162 MHz on a secondary basis only consistent with the provisions contained in ET Doc. 92-9, and a waiver is hereby granted of the location requirements for an MDS Channel 2 station at 47 C.F.R. Sec. 21.901(c);

11. IT IS FURTHER ORDERED That this modification is subject to the following conditions:

(a) Nothing contained herein shall be construed to authorize any change in the station authorization, including a change in transmitter location, except as specified in VCI's application on FCC Form 494 (File No. 50206-CM-MP-93). Any other changes require prior authorization after the submission of another modification application.

(b) VCI must comply with the certificate of completion of construction requirements on its authorization (to be issued separately);

(c) The modification specified in this order shall be effective the day after the certificate of completion of construction is filed PROVIDED that the certification is filed in a condition which is correct, complete and in compliance with Commission rules, and if it is accompanied by the appropriate filing fee.

12. This order is issued pursuant to Sections 0.291 and 1.87 of the Commission's Rules, 47 C.F.R. Secs. 0.291 and 1.87, and is effective on its release date.

FEDERAL COMMUNICATIONS COMMISSION

James R. Keegan
Chief, Domestic Facilities Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

LETTER
July 13, 1994

Released: July 29, 1994

KARK-TV, Inc.
Licensee, Television
Station KARK-TV
201 West Third Street
Little Rock, AR 72203

IN REPLY REFER TO:
8310-GU
93100981
94021235

Attention: H. Dean Hinson

Dear Licensee:

By letter of January 11, 1994, we inquired into an alleged violation of Section 73.1206 of the Commission's Rules regarding the broadcast of telephone conversations. Our letter reported a complaint that during the week of September 27, 1993, several reporters at Television Station KARK-TV placed telephone calls to Mattie Hudgons of Stone Mountain, Georgia, and, without informing her that the conversations were intended for broadcast use, recorded them and subsequently broadcast them.

Your reply of February 11, 1994, states that Ms. Hudgons and her whereabouts were the subjects of an ongoing investigative report by KARK-TV news. You concede that, in connection with this investigation, KARK-TV news staffers initiated, and recorded, several telephone calls to Ms. Hudgons, but state that only one was broadcast. In this instance, you explain, the assignment editor identified himself to Ms. Hudgons, at which point she placed him on hold and never returned to the telephone; if she had, the assignment editor had full intentions of informing Ms. Hudgons that any conversation that would take place was being recorded. You argue that the broadcast of this recorded telephone call was not a violation of our rule because it was not a "conversation," and that it was broadcast only for the purpose of showing where Ms. Hudgons could be found.

Section 73.1206 in pertinent part requires that before broadcasting a telephone conversation live, or recording it for broadcast, a licensee must inform any party to the call of the licensee's intention either to record the conversation for broadcast or to broadcast the call simultaneously with its occurrence. In rejecting arguments that the rule should be deleted or relaxed, the Commission stated,

> [W]e believe that it is reasonable and desirable to retain for individuals the right to answer the telephone without having their voice or statements transmitted to the public by a broadcast station in the absence of prior notice. For similar reasons, and in order to ensure effective compliance with respect to the broadcast of telephone conversations, we believe that individuals should continue to have the right to prior notice in cases where a telephone conversation is being recorded for later broadcast.

Amendment of Section 1206; Broadcast of Telephone Conversations, 3 FCC Rcd 5461, 5463 (1988). "Conversation" as used in the rule includes any word or words spoken during the call. *Heftel Broadcasting-Contemporary, Inc.*, 52 FCC 2d 1005, 1006 (1975). Thus, individuals have a right to such prior notice even if it involves recording and broadcasting only one word.

Based on the facts of this case, it appears that KARK-TV has violated Section 73.1206 of the Commission's Rules by recording and broadcasting the telephone call to Ms. Hudgons during the week of September 27, 1993, without informing her, before recording it, of its intention to do so. It appears, however, that the call was made for purposes of verification in the process of conducting an investigation and not for the principal purpose of broadcasting. Accordingly, you are HEREBY ADMONISHED for this rule violation, and you are cautioned to use care to avoid such violations in the future. This matter will be made a part of KARK-TV's permanent file.

Sincerely,

Norman Goldstein, Chief
Complaints and Investigations Branch
Enforcement Division
Mass Media Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 93-176

In re Application of

RICHARD RICHARDS File No. BRTTL-921116IG

For Renewal of License of
Low Power Television
Station K33CG,
Sierra Vista, Arizona

Appearances

Thomas Schattenfield, Esq. and *Gerald P. McCartin, Esq.* on behalf of Richard Richards; *Charles E. Dziedzic, Esq.* and *Robert A. Zauner, Esq.* on behalf of the Mass Media Bureau.

INITIAL DECISION OF ADMINISTRATIVE LAW JUDGE RICHARD L. SIPPEL

Issued: July 25, 1994; Released: July 29, 1994

PRELIMINARY STATEMENT

1. This proceeding was set for hearing by the Commission on June 28, 1993, under its *Hearing Designation Order* FCC 93-305 (*"HDO"*), reported at 8 F.C.C. Rcd 4339 (1993). The hearing concerns the renewal of the license of low power television station K33CG, Sierra Vista, Arizona which is assigned to the station's owner Richard Richards ("Richards"). The issues to be resolved are the following:

> (a) To determine in light of Richard Richards' conviction for violating Title 21, United States Code, Sections 841 (a)(1), 841 (b)(1)(D) and 841 (b)(5), whether Richards possesses the requisite qualifications to be the licensee of station K33CG.
>
> (b) To determine, in light of the evidence adduced pursuant to the foregoing issue, whether the grant of the application to renew the license of station K33CG will serve the public interest, convenience and necessity.

2. This case involves the trial of the above issues in connection with Richards' application for renewal of license of low power television station ("LPTV") K33CG, at Sierra Vista, Arizona. *HDO* at para. 1. The LPTV station rebroadcasts the signal of Station KTBN-TV, Santa Ana, California, twenty four hours each day of the week. Richards estimates that the LPTV signal covers a population of from 50,000 to 60,000 persons. Richards believes that the LPTV station serves between 1,000 and 2,000 homes. The programming includes talk shows, religious education, religious music, prayer, services and inspirational and family programs. (Richards Exh. 1 at 1-2.)

3. The Commission has assigned to Richards the burden of proceeding with the introduction of relevant evidence and the burden of proof with respect to the issues. *See HDO* at para. 5. Each of the issues is based upon multiple criminal felony convictions. Those convictions were based on pleas of guilty by Richards to a charge of felonious possession of marijuana with intent to distribute, and to a charge of the felonious cultivation of marijuana on federal property. Those charges were brought and the pleas of guilty were entered on May 4, 1992, in the United States District Court for the District of Arizona. (Bureau Exh. 2.)

4. The Presiding Judge ordered Richards to provide Bureau counsel with a summary of his proposed mitigation evidence. *See Prehearing And Trial Order,* FCC 93M-446, released July 8, 1993. A telephone conference was held on August 26, 1993. *See Order* FCC 93M-552, released August 26, 1993. Richards was granted additional time to obtain counsel and to comply with the prehearing instructions. *See Order* FCC 93M-554, released August 27, 1993. Hearings were held in Washington, D.C. on December 5, 1993, and on February 23, 1994. The record was closed for all purposes on March 14, 1994. *See Order* FCC 94M-98, released February 25, 1994. A date for the filing of Proposed Findings Of Fact And Conclusions Of Law was set initially for March 28, 1994, and a date for the filing of Reply Proposed Findings Of Fact And Conclusions Of Law was set for April 18, 1994. *Id.* Subsequent extensions of time were granted for cause and the parties were ordered to file Proposed Findings And Conclusions on April 26, 1994, and Reply Findings And Conclusions on May 17, 1994. *See Order* FCC 94M-262, released April 14, 1994. The parties have complied and the record is now set for a decision.

FINDINGS OF FACT

5. Richards has been a resident of Sierra Vista, Arizona since 1968. He has been self-employed as a grower and a distributor of food consisting largely of vegetable crops such as apples, peaches, pears, carrots and garlic. (Richards Exh. 1; Tr. 43-45.) Those crops were grown on an 82.5 acre parcel of land known as the "Montezuma Ranch," which was located approximately three-quarters of a mile from the Mexican border. The ranch was surrounded on three sides by federal land and on one side by state land. (Tr. 50.) From 1985 to 1992, Richards resided in a house that was on the property. Richards currently resides on an 80 acre plot of leased farmland in St. David, Arizona, on which he grows, harvests and sells organic vegetables. (Richards Exh. 1 at 1.)

Criminal Convictions

6. On July 25, 1991, law enforcement authorities obtained a search warrant for the Montezuma Ranch. They thereafter seized marijuana plants, eighteen scales that were available to measure quantities of marijuana, heat sealers used to seal plastic bags, marijuana debris, two mobile telephones and two pagers. (Tr. 45-48.) The debris was found in a partially hidden room where marijuana leaves were hung to dry. (Tr. 51-53.) Richards admitted that there were two marijuana plants growing on the ranch and that there were between thirty four and thirty seven marijuana plants that were growing on the adjacent federal park land. (Tr. 49.) Richards admitted that he was responsible for the cultivation of the marijuana plants that were grown on federal property. He intentionally used the federal property

to grow plants because he thought that if caught the Montezuma Ranch would not be subject to seizure. (Tr. 77, 155.)

7. On February 19, 1992, Richards was indicted for violation of Title 21 of the United States Code. Section 841 (a)(1), for his possession with intent to distribute a number of marijuana plants. (MMB Exh. 2 at 1.) Thereafter, on May 4, 1992, Richards entered into a plea agreement whereby Richards acknowledged that the following accurately described his involvement in the criminal activities that the government could prove beyond a reasonable doubt:

> That on or about July 25, 1991, defendant Richard Richards was in knowing possession of between 37 and 41 marijuana plants, some plants being grown on his property and some plants being grown on national Park Service property. Richards was the owner of these plants, he knew them to be marijuana plants and he intended to distribute the plants or the processed marijuana derived from these plants to another person or persons.

(MMB Exh. 2 at 5-6.)

8. On July 31, 1992, a Judgment was entered in the criminal case against Richards specifying that he had been convicted of:

> violating Title 21, United States Code, Sections 841 (a)(1), 841 (b)(1)(d) and 841 (b)(5), possess (sic) with intent to distribute less than 50 kgs (Marijuana I) and cultivating marijuana on federal property, as charged in Count I of the Indictment.

The Judgment also specified that Richards was to be placed on probation for a period of five years, that he must serve a term of seven months under house arrest, that he must submit to substance abuse testing, and that he must participate in substance abuse counseling as directed by the U.S. Probation Office. (MMB Exh. 3.)

9. As part of the plea agreement, Richards consented to a civil judgment in a concurrent civil action pursuant to which he forfeited the Montezuma Ranch and the house thereon which Richards estimated to have had a market value in 1993 of $1 million dollars. (Richards Exh. 1 at 4; Tr. 148-50.)[1] The government did not and could not seek the revocation of Richards' broadcast license pursuant to the revocation of federal benefits provision of Title 21 [21 United States Code Section 862 *et seq.*]. (Richards Exh. 28.) *See* para. 29, *infra.*

Station Operations

10. Richards constructed LPTV Station K33CG by expending approximately $42,000 of his own funds. (Richards Exh. 1 at 2.) The Commission has received no complaints about its operations. The station originates the programming of the Trinity Broadcasting Network, a religious network with affiliates throughout the United States and in other countries. (Richards Exh. 1 at 1.) The station has no employees. Richards installs antennas for users free of any installation charge. The Trinity Broadcasting Network reimburses Richards with 80% of the donations received from Station K33CG listeners which income is used by Richards to defray operating expenses. (Richards Exh. 1 at 2-3.) Richards had plans to originate up to 3.5 hours of local programming per day which he hoped would qualify for inclusion on the local cable system. (Richards Exh. 1 at 3.)[2] After his arrest, Richards attempted to assign the Station to Ms. Elsi Weick, his mother (File No. BALTTL-920603JC). The Bureau rejected the application because of the conviction. Richards had hoped to complete the divestment before his conviction in an effort to keep the Station on-the-air with its present format. (Tr. 144-45.)

Character Evidenced

11. Richards has offered into evidence twenty five statements under oath from persons in the community who attest to his good character. (Richards Exhs. 2-27.) These twenty-five persons are listeners of Richards' programming. The Bureau offered no objection to the receipt and consideration of this evidence. In its cumulative effect, these unrebutted statements establish that even after the conviction, Richards has a reputation for truthfulness and honesty among the listeners of Station K33CG. Richards and the listeners share a common religious orientation which they wish to have advanced on Station K33CG. They also show that Richards has a religious orientation which is reflected in the station's programming. Those religious interests are also shared by the persons submitting the testimonials. The statements also show that Richards has admitted to his listeners the legal and moral wrong of his past criminal conduct in connection with his use of marijuana. However, the statements are limited to only the opinions of listeners of Richards' programming who share Richards' beliefs. They do not establish Richards' reputation for truthfulness and honesty in the general Sierra Vista community.[3]

Mitigation And Rehabilitation

12. Richards represents that he has been convicted of only one additional crime, a misdemeanor conviction for domestic violence and assault in January 1990.[4] Station

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[1] At the time of the forfeiture, there were existing liens on the property that were securing loans in the amount of approximately $275,500. (Tr. 115-23.) Richards' obligations in that amount would be excused by the foreclosure procedures. (Bureau Exhs. 7 and 8.) Therefore, the forfeiture is materially mitigated to the extent that the property is used to honor Richards' debts even after the title had passed to the U.S. government.

[2] Under the terms of the network agreement between Richards and the Trinity Broadcasting Network, Richards may only broadcast 3.5 hours of local programming per day. (Id.)

[3] Richards' religious beliefs are irrelevant as an enhancement of his credibility. *Gov't Of Virgin Islands* v. *Petersen,* 553 F.2d 324, 328-329 (3rd Cir. 1977). Also, reputation testimony is confined to the nature of the observations and acquaintances upon which the opinion is based. *Id.* at 329. The persons submitting statements were not shown to have knowledge of Richards' reputation among non-listeners within the Sierra Vista community.

[4] The term "domestic violence and assault" without further explanation can conjure up images of heinous conduct. It appears that Richards saw it to be in his best interest to describe the assault. Richards discloses with specificity in his written testimony that "the assault involved tossing a turkey at [his] estranged spouse in the course of an argument." (Richards Exh. 1 at 4.) This misdemeanor conviction is remote in time and is not related to drug trafficking. It will not be a factor in deciding this case.

K33CG has not been cited for an FCC rule violation. The findings on "Station Operations," *supra,* which is evidence offered by Richards in mitigation, are incorporated here.[5]

13. Richards relies on evidence of rehabilitation in arguing mitigation on the following factors: (a) he has not used marijuana since December 31, 1991; (b) he has never used any other drug; (c) since the mid-1980s, Richards has been born again in the religious sense and since then he has realized that his personal use of marijuana was wrong;[6] and (d) letters from and conversations with listeners show that Richards provides valuable programming to the community of Sierra Vista. (Richards Exh. 1 at 4-5.) Richards also pledges to continue quality programming to the community if the license for Station K33CG is renewed. (*Id.*)

14. There is no evidence to rebut Richards' assertion that he has not used marijuana since December 31, 1991, or that Richards has ever used any illegal substance other than marijuana. (Richards Exh. 1 at 4.) However, he had continued to use marijuana between the time of his arrest on July 25, 1991, and December 31, 1991. He ingested such a quantity of marijuana on December 31, 1991, that, as a consequence, Richards tested positive for marijuana use in February and March, 1992. (Tr. 108, 112-114.)[7] Since commencing probation supervision on July 31, 1992, he has undergone random drug testing, none of which has proven to be positive. By letter to Richards' counsel dated November 26, 1993, a Probation Officer of the United States District Court reported that the random tests were all negative, meaning that there was "no evidence of drug use by Mr. Richards." (Richards Exh. 27.) Richards also has cooperated in meeting his responsibilities as a parolee. (*Id.*) However, Richards has not offered any independent or expert evidence to show that he has been cured of his substance abuse habit or that he has the habit under control. Richards has admitted that at the time of his arrest he had formed a habit for the use of marijuana. He has contended in testimony that his sole purpose for growing marijuana was to support his habit. (Richards Exh. 1 at 3-4.) Richards admits that he employed means to increase the potency of plants because "[a]s a heavy user of Marijuana, [Richards] had developed a tolerance to it, so potency was important to him." (Richards Exh. 30.) There is no evidence from a drug counselor on the status of his rehabilitation.

15. Even Richards' own testimony is not definitive on whether or not he might in the future resume his habit. He submitted written testimony in which he stated that in the mid-80s he had reached a realization through a religious experience that his use of the marijuana substance was wrong. (Richards Exh. 1 at 4-5.) But there is no evidence that he had attempted to give up the habit until the time that he was apprehended in July, 1991. And even after his arrest, he continued to use the substance. *See* Para. 14, *supra.* He states that he had justified the use of marijuana as a victimless habit. (Richards Exh. 1 at 5.) He also states that he "regrets [his past] marijuana use" and that he now looks to the future as a broadcaster of religious programming. (*Id.*)

16. The mitigation and rehabilitation evidence will be considered in light of Richards' misconduct. The evidence of "distributing" illegal drugs involved the growing and storage of ten marijuana plants for the benefit of a friend with an understanding that they be returned to the friend when they reached maturity. (Richards Exh. 1 at 3-4.) Those plants were returned to Richards' friend as agreed. Richards retained nine plants for himself which he had raised and processed in a manner that was calculated to achieve the highest degree of potency. (Tr. 152.)[8] Thus, there is substantial evidence that shows through a conviction and admissions that Richards in fact distributed marijuana to his friend. In addition, Richards admitted that on a trip to California he had a "stash" of marijuana for his use and for the use of a companion with whom he was travelling. (Tr. 90.) The evidence of record would not support a finding of a distribution of marijuana beyond the admitted distributions of marijuana to a friend and to the traveling companion.

17. The evidence relied on by Richards for mitigation is considered under the factual setting and circumstances surrounding the crime. Therefore, taken into account is the fact that at the time of arrest, Richards had control of more than thirty seven marijuana plants. Also considered is the evidence of the scales that are designed to measure small amounts, the marijuana debris, the mobile telephones, the

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[5] It is recognized that the weight to be given to station operations is minimal as probative of mitigation. *Cf. KQED, Inc.,* 5 F.C.C. Rcd 1784, 1785 (Comm'n 1990), 6 F.C.C. Rcd 625 (Comm'n 1990).

[6] Richards testified:

> I had justified my marijuana use by the fact that it did not harm anyone else or myself. For me, it was a mild stimulant, like coffee. I regret my marijuana use, but I am now focused on the present and the future, not on the past. I am committed to serving my community by spreading the word of the Lord through the Station. (Richards Exh. 1 at 5.)

[7] There is also uncorroborated testimony of Richards wherein he represents that in 1988-89, he participated in an operation with the U.S. Drug Enforcement Authority ("DEA") to apprehend smugglers of marijuana from Mexico. (Tr. 161-62.) Richards conjectured that in the course of "the operation," marijuana was left in bales by the smugglers on the adjoining federal property. This was done with DEA's knowledge according to Richards. Sometime in 1988, the smugglers were apprehended and the DEA seized the bales. (Tr. 154-55.) However, according to Richards, there were seeds that had dropped from the bales that remained dormant. In 1991, Richards was farming carrots on the Montezuma Ranch land. A sprinkler irrigation system inadvertently sprayed water on the dormant seeds on the federal land and about 100 marijuana plants sprang up. (Tr. 162-63.) At least that was Richards' "theory" [Tr. 163] which he formulated after he was arrested. (Tr. 160-61.) In early July 1991, before his arrest, Richards and a friend dug out the plants, transported them forty miles, and dumped them into the San Pedro River. (Tr. 160.) Those plants were disposed of by Richards so that he would not run the risk of the plants being discovered while he was in Chicago visiting his sick father. (Tr. 155.) There was no evidence of corroboration or that Richards notified DEA of those events. No credence shall be given to this imaginative, uncorroborated and self-serving account.

[8] According to Richards, at a point in their growth, Richards discarded the male plants so that the female plants would be rendered seedless thereby maximizing the potency of the buds. (Richards Exh. 30 and Joint Exh. 1.) Richards admitted that he wanted to smoke only the best, i.e, the marijuana with the highest potency. (Tr. 152.)

pagers, the heat sealers and the admission that other plants had been grown by Richards. That circumstantial evidence in the aggregate support the equally plausible inference that Richards, his friend and his companion were not the only users, or intended users, of the marijuana that was grown by Richards.[9]

Credibility Findings

18. Richards has the burden of proof on all issues of this case, including the issues of mitigation and rehabilitation. *See HDO* at para. 5. Richards' testimony is the evidence mainly relied upon to meet those burdens. There are no corroborating witnesses. The assessment of Richards' credibility is undertaken here as a separate matter in order to determine whether Richards has met his burdens. Also, Richards seeks to put the drug trafficking conviction in the most favorable light. Therefore, Richards has a clear motive to attempt to fabricate business needs or to offer seemingly innocent reasons for otherwise incriminating evidence that was found at the scene of the crime.

19. There is evidence in the record relating to Richards' credibility that tends to negate mitigation in this case. First, if Richards' uncorroborated testimony were to be believed with respect to the origin and use of the 100 plants that he disposed of shortly before his arrest,[10] the facts would show that while he was a regular and heavy user of marijuana, he participated in a government sponsored operation in cooperation with the DEA. He also would have been growing marijuana on federal land at the time he was a DEA operative. There is no evidence that he disclosed to the DEA his condition as a heavy user or the fact of his marijuana growing on federal land. Richards has thus shown a capacity to grow marijuana on federal property and to use marijuana heavily while he is engaged in a government related enterprise or activity. Second, Richards purposefully chose to grow marijuana on federal land in order to seek to avoid the forfeiture of his own land should he get caught. (Tr. 77, 155.) Thus, he has shown a propensity to deal dishonestly with government property for his own advantage. This is substantial evidence of a negative trait for truthfulness and reliability.

20. Richards also has testified to exculpatory circumstances on which he asks the Presiding Judge to base findings that would support a renewal of Richards' license. Richards admits that at the time of arrest he was in possession of approximately 18 scales, including one scale (a "triple beam") that was capable of measuring weights as low as one gram. (Tr. 46.) But Richards asserts that he used the scales only in weighing produce for sale. (Tr. 79-81, 146-47.) Richards also referred to himself as a "scale buff" who collects scales. He testified that he sold garlic, herbs, chaparral and other items by the ounce and that he would weigh plastic bags by the gram to deduct their weight from the weight of the orders which were to be shipped. (Tr. 80.) Richards argues that the scales were used only in lawful enterprises and for lawful purposes. But there is no business need shown for a scale that can weigh a plastic bag that is being filled with garlic or any other product for shipment. As to incriminating circumstances, on cross-examination Richards testified to marijuana purchases which he recorded in gram weights. (Tr. 82-83 and Bureau Exh. 5.) Marijuana was measured in gram weights and there is substantial evidence showing that Richards was a heavy user of marijuana. (Tr. 90.) There were no records of Richards introduced that would show a legitimate business purpose that required the use of gram measurements.[11] There was no witness called or industry literature introduced to corroborate Richards' explanation. Finally, the record does not establish that the gram scale was used exclusively for the verifying of garlic shipments and was never used for the weighing of marijuana in connection with a purchase or sale. Therefore, there is no reasonable basis for accepting the truth of Richards' testimony that the gram scale was used solely for innocent purposes.

21. Richards also lacked credibility in his testimony about a ledger that was under his control and that was seized at the time of his arrest. (Bureau Exhs. 4-5.) When first asked the question, Richards answered that he was not aware of a ledger or record showing sales of marijuana. (Tr. 54.) Richards then was shown a document (Bureau Exh. 4) and he testified that he had seen the document when his criminal lawyer showed it to him around the time of the arrest. (Tr. 56.) Richards testified that he did not know whether he had written the notations in the ledger: "I have no way of knowing for sure if it is or was my handwriting." (Tr. 57.) Richards admitted that the police found the record in a place where he stored his records and that the document was included in the police evidence report. But when asked by the Presiding Judge whether it was his handwriting, Richards answered:

> I mean, I had this question in the beginning and I would -- I don't -- for the record, I don't want to say that it's not mine, but I don't want to be too quick to say that it was mine because I'm not sure.

(Tr. 58.) Richards testified that he had not ever denied that it was his handwriting. But he also testified that no one had asked that question before. (Tr. 59.) Richards admitted that he was the person who was responsible for the filing system in that area. (Tr. 66.) Later, Richards identified a name, "Terry", as his cousin. Richards then said that he was more than 50% certain that the ledger entries were in fact made in his handwriting. (Tr. 71.) Richards explained that the record, which was written in code, reflected that Richards had paid his cousin $200 for marijuana. (Tr. 73.) There were a series of transactions recorded in excess of

[9] For example, the evidence also establishes that Richards was a regular customer of a cousin from whom Richards purchased marijuana. (Tr. 71, 73 and Bureau Exhs. 4-5.) Richards has denied that there were any sales of marijuana to his cousin (Richards Exh. 1 at 3) and there was no direct proof of any such sales. However, there was ample opportunity for Richards to have also supplied his cousin with marijuana that was grown on the ranch. And Richards did not produce his cousin as a corroborating witness.

[10] *See* fn.7, *supra*.

[11] Richards stated in cross-examination that crops in 1989-91 were carrots, squash and garlic. He described garlic as an expensive crop. There were no sales of garlic in the first year it was planted. There were sales in the next three years of 400 pounds, 2,000 pounds and 5,000 pounds. (Tr. 92-93.) But there were no records to show gram weighing and no corroboration that a gram scale was used solely in connection with legitimate farming and/or in selling and shipping garlic.

$13,000. (Tr. 73-75.) Richards insisted that he only purchased marijuana and that he never sold marijuana. When shown a second ledger (Bureau Exh. 5) and asked to identify his handwriting, Richards flippantly answered: "assume it is." (Tr. 81-82.) Richards then explained that Bureau Exhibit 5 was a supplement to Bureau Exhibit 4. (Tr. 82.)

22. The Bureau's Exhibits 4 and 5 had been taken from Richards' custody in 1991, incident to a search warrant. They were included in a police report and they were reviewed with Richards by his criminal lawyer in connection with the plea agreement. It was a patent disregard of his duty to be forthright as a witness for Richards to hedge the identification of his handwriting. Such circumventing of the truth in this hearing is empirical evidence that supports the finding of future unreliability that is inferred from the criminal convictions. Thus, we see that Richards' future communications with the Commission cannot be trusted.

CONCLUSIONS OF LAW

23. The Commission's policy is to consider any matter coming to its attention that raises a material doubt as to whether a grant of a broadcast license would be in the public interest and that a revocation will apply for any reason that would warrant a denial of an application. *South Carolina Radio Fellowship, et. al.*, 6 F.C.C. Rcd 4823 (Comm'n 1991). The Commission's hearing designation order in this case states:

> The Commission considers felony convictions relevant to our evaluation of a licensee's character. [Citation omitted.] Moreover, the Commission regards drug trafficking as a matter of the gravest concern and we have stated our intention to apply policies that reinforce both private and government efforts to eradicate drug trafficking. [Citations omitted.] In this regard, we stated our intent to take all appropriate steps, including license revocation proceedings, where information comes to our attention that Commission licensees or their principals have been convicted of drug trafficking. *Public Notice*, 4 F.C.C. Rcd 7533 (Comm'n 1989).

HDO, supra at Para. 3. Here, the burden is on Richards to make a significant showing of mitigating circumstances or rehabilitation in order to avoid a denial order. *See South Carolina Fellowship, supra* at 4824; *Character Policy Statement*, 102 F.C.C. 2d 1179, 1228 (Comm'n 1986); and *RKO General, Inc.*, 5 F.C.C. Rcd 642, 644 (Comm'n 1990). Richards has failed to meet this burden.

24. The crux of the Commission's concern with the felony conviction is the relationship between that conviction and Richards' propensity for untruthfulness in dealing with the Commission and his unreliability in conforming with Commission rules. *Policy Regarding Character Qualifications in Broadcast Licensing*, 5 F.C.C. Rcd. 3552 (1990). The Commission has stated its policy as follows:

> [W]e believe a propensity to comply with the law generally is relevant to the Commission's public interest analysis, and that an applicant's or licensee's willingness to violate other laws, and, in particular, to commit felonies, also bears on our confidence that an applicant or licensee will conform to FCC rules and policies.

5 F.C.C. Rcd at 3253 (relevant non-FCC misconduct). Richards' intentional trespass upon federal land to carry out a criminal enterprise, his intentional misuse of federal land to avoid the consequences of his crime, and his conduct as an admitted heavy user of marijuana after his arrest constitute acts of "misconduct so egregious as to shock the conscience and evoke almost universal disapprobation." *Character Qualifications*, 102 F.C.C. 2d at 1205 n.60. He even used a portion of his home to dry out marijuana leaves. (Tr. 51-53.) The fact that children occupied or visited the home did not deter Richards. He merely boarded up the room to keep the children away or to conceal his activities or both. (Tr. 51-52.) Such conduct carried out in connection with a felonious enterprise while Richards was an admitted heavy marijuana user are circumstances above and beyond the felony conviction that in their totality further support revocation. For the Commission has found that:

> [nonbroadcast misconduct] might, of its own nature, constitute *prima facie* evidence that the applicant lacks the traits of reliability and/or truthfulness necessary to be a licensee...

Id.[12] The fact that there were no reported FCC violations in connection with Station K33CG does not alter the conclusion that Richards is not to be trusted with government property, i.e., a broadcast license.

25. In addition to the uncontested evidence of a felony conviction and the above described related egregious conduct, each of which is an independent ground to revoke, the Commission has a specific policy with respect to drug traffickers. The Commission considers "drug trafficking as a matter of gravest concern" and it has adopted the following policy:

> [A]bsent extenuating or mitigating circumstances, the Commission intends promptly to take all appropriate steps, including initiation of license revocation proceedings, where information comes to our attention that FCC licensees or their principals have been convicted of drug trafficking [Footnote omitted.]

Public Notice, Commission Clarifies Policies Regarding Licensee Participation in Drug Trafficking, 4 F.C.C. Rcd. 7533 (1989). The Commission held in requiring a licensee to show cause in a consolidated renewal and revocation case:

> We think [drug trafficking] is within the category of 'egregious' non-FCC offenses entailing such callous disregard for the welfare of fellow citizens as to place

[12] The Commission stated in 1986 that it could not then contemplate the misconduct except that there must be "specific misconduct." *Id.* The specific misconduct of Richards in cavalierly using federal land to grow marijuana to support his heavy habit while engaging in a related drug trafficking criminal enterprise and to continue the use of marijuana even after arrest should suffice.

> at issue the perpetrator's qualifications to be or remain a broadcaster. A doubt certainly exists as to whether someone recently found guilty of such an egregious crime against society would faithfully serve the public in exercise of their vast and important discretion that this agency entrusts to licensed broadcasters. [Footnotes omitted.]

Williamsburg County Bdcstg. Corp., supra. 5 F.C.C. Rcd 3034, 3035 (Comm'n 1990) (Order to Show Cause). Richards asks that the doubt be resolved favorably. He argues that his criminal conduct did not involve "systematic devotion to a criminal enterprise" or reflect a "callous disregard for the welfare of fellow citizens" and that therefore his criminal conviction does not amount to "an egregious crime against society." Richards even seeks to convince the Commission that:

> In fact, it is a stretch to label his conduct as "drug traffick-ing" at all. Richards grew marijuana for his personal use and agreed to grow a friend's marijuana plants and return them to him at maturity. Only in the most technical of senses does Richards' agreement with his friend constitute an agreement to "distribute" marijuana.

See Richards' Proposed Findings and Conclusions at 32. Richards then asks for an analysis of the facts underlying the conviction to determine whether they are of such an egregious nature that they would warrant Richards' disqualifi-cation. *Id.* Facts and circumstances attendant to Richards' arrest have been considered in this decision. But a more detailed analysis of the facts attendant to the plea conviction would require a review of evidence that is not in this record.[13] The conviction was the result of a plea bargain and therefore not all of the relevant facts are included in this record. But those facts that are in the record, including those that are relied upon by Richards for mitigation, will only support a denial of a broadcast license application. Certainly, the felony conviction was not a mere technicality. That is clear from the fact that the crime to which he pleaded guilty was no mere misdemeanor -- it was a felony. Richards' argument makes light of his crime and, significantly, at no point does Richards' recognize that through his misconduct he has breached his trust as a Commission licensee.

26. The evidence of record establishes that Richards was engaged in a systematic criminal enterprise[14] in the growing and harvesting of marijuana on federal property. "Drug trafficking" has been defined with approval in a jury instruction as "possession with intent to distribute." *U.S. v. Logan,* 998 F. 2d 1025, 1030 (D.C. Cir. 1993). There was no instruction needed on whether it was a one-time distribution or a distribution made only to one person. There also was a finding of possession with intent to distribute where narcotics were found by police on an accused's premises in an amount that was inconsistent with personal use and where the arresting officers found "tools of the trade" that included a drug ledger and an electronic scale. *U.S. v. Echeverri,* 982 F. 2d 675, 676-79 (1st Cir. 1993). Here, when Richards was arrested, the police found approximately thirty nine marijuana plants (thirty seven on federal land), a marijuana ledger, scales (including one that weighs by the gram), a heat sealer of plastic bags, mobile telephones and pagers and a concealed room set aside for drying harvested marijuana plants. As the court held in *Echeverri,* such facts were sufficient to convict. Here, as in *Echeverri,* there is no need to "paint the lilly." *Id.* at 678. In one sense, the case here of drug trafficking against Richards is stronger because he was the source (the grower) and not just an intermediary. Clearly, it is no "stretch" to conclude that Richards was a "drug trafficker" as that term is used by the Commission under its policy against the licensing of "drug traffickers." Richards' conviction is further exacerbated by his admission that he continued to use heavily the marijuana drug even after his arrest and at a time that he was a Commission licensee. And Richards' personal assurance that he has received a religious conversion does not provide a reasonable assurance that there will be no recidivism on his part, particularly in light of the instances of his fanciful testimony in this proceeding.

27. The Commission has found that "all felonies are serious crimes [and] any conviction provides an indication of an applicant's or licensee's propensity to obey the law." *Policy Statement, supra* 5 F.C.C. Rcd at 3553-54. However, the Commission requires that "mitigating factors" be taken into account in determining whether a licensee has a "propensity to obey the law." *Id.* Those factors include the misconduct's willfulness, frequency, currentness, seriousness, efforts to remedy the wrong, overall record of compliance with FCC rules, and rehabilitation. *Id.* Richards did nothing to correct the wrong before he was apprehended. Richards participated personally in the misconduct. There is no evidence of efforts made to remedy the wrong such as providing assistance to the persons who were harmed by the marijuana that Richards grew and distributed or volunteer work on Richards' part with persons who are addicted to drugs. Richards has participated in drug testing only as a condition of the suspension of his sentence. But that participation is of necessity. It is not voluntary conduct that might be viewed as rehabilitative or as a remedy of the wrong. And there is not substantial evidence that Richards has gained control over his habit.

SUMMARY CONCLUSIONS

28. Conclusions on rehabilitation are dependent upon the facts of this case. *Policy Statement, supra.* 5 F.C.C. Rcd at n.4. Based on the evidence, Richards has not been involved in growing, distributing or using marijuana since December 1992, because he was apprehended and convicted and his land, whereon he grew the marijuana, was seized. He is now serving a suspended sentence. Richards has a good reputation among persons in the Sierra Vista community having the same programming interests as

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[13] For example, such an expanded analysis would include an examination of facts and circumstances surrounding charges of Richards engaging in witness tampering in counts two, three and four of the indictment. *See* rejected Bureau Exh. 1. Richards has objected to any inquiry into those related counts which were not the subject of the plea bargain and his objection was sustained. (Tr. 95.)

[14] An enterprise is defined as a "project or undertaking." *Black's Law Dictionary* (4th Ed). The criminal activities to which Richards has pleaded guilty meet that definition.

Richards. But there is not substantial evidence in the record showing that Richards will not return to using marijuana while he holds a Commission license or that he will be a truthful and reliable licensee. His felonious activities with respect to using federal land to provide a source for marijuana, his continued use of marijuana after arrest, his failures to disclose to the DEA, a federal agency, his incredible uncorroborated testimony, and his adamant refusal to identify his own handwriting on Bureau exhibits outweigh the character testimony and reinforce the adverse inferences that flow from Richards' felony convictions. *Cf. South Carolina Radio Fellowship, supra,* 6 F.C.C. Rcd. at 4824. Therefore, it cannot be concluded that Richards is rehabilitated and that he will be a truthful and reliable Commission licensee in the future.

29. Richards has admitted to willfulness in the commission of a felony. He has also admitted that as of December 31, 1991, he was a heavy user of a high quality of marijuana. His wrongful growing of marijuana on federal property and his distribution of marijuana were continuous acts which meet a standard of frequency. The arrest occurred in 1991 and the conviction took place only two years ago. Therefore, the misconduct was current. *Cf. South Carolina Radio Fellowship, supra,* 6 F.C.C. Rcd at 4824 (conviction less than four years prior is current). The fact that the prosecutors did not seek revocation of Richards' broadcast license pursuant to Title 21 is irrelevant. (Richards Exh. 28.) Title 21 covers only the "issuance" of federal benefits. It does not authorize a revocation. *See Report And Order,* 6 F.C.C. Rcd 7551, 7553 (Comm'n 1991). The Commission has been delegated the primary responsi-bility for the licensing of broadcast stations and, with this record, the Commission may act in the public interest by denying Richards a renewal of the license for Station K33CG. *Id.*

30. The Commission is concerned primarily with Richards' propensity for truthfulness and his reliability to conform with Commission rules. His multiple felony convictions while a Commission licensee coupled with his demonstrated propensity to use federal property in a criminal enterprise[15] involving marijuana growing and distribution demonstrate a propensity for untruthfulness and dishonesty in dealing with federal property. That conclusion is further supported by Richards' continual use of marijuana while a Commission licensee for six months after his arrest and the incredible, uncorroborated and uncooperative "testimony in this case. *See South Carolina Radio Fellowship, supra,* 6 F.C.C. Rcd at 4824 (a drug conviction sufficient for revocation is reinforced by admissions of fact that compound the crime). Therefore, based on the recent multiple felony convictions and the Commission policy with respect to drug trafficking, it is concluded that it would not be in the public interest for Richards to be trusted further with a broadcasting license.

ORDER

IT IS ORDERED that the license renewal application of Richard Richards (File No. BRTTL-921116IG) for Station K33CG, Sierra Vista, Arizona, IS DENIED.[16]

FEDERAL COMMUNICATIONS COMMISSION

Richard L. Sippel
Administrative Law Judge

[15] The wrongful use of federal property is twofold: first, the trespass on federal land to commit a crime, and second, the use of federal land to grow the marijuana crop so as to avoid an escheat of Richards' contiguous land if the law enforcement authorities learn of the activity.

[16] This Initial Decision shall become effective and this proceeding shall be terminated 50 days after its public release if exceptions are not filed within 30 days thereafter, unless the Commission elects to review the case on its own motion. 47 C.F.R. §1.276(b).

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: July 14, 1994

RULEMAKING NUMBER ASSIGNED TO PETITION FOR RULEMAKING AND PETITION FOR RELIEF IN SECTION 214 VIDEO DIALTONE APPLICATION PROCESS

On June 13, 1994, the Commission released a Public Notice (DA 94-621) establishing a pleading cycle for comments on the Petition for Rulemaking and Petition for Relief filed by the Center for Media Education, Consumer Federation of America, the Office of Communication of the United Church of Christ, the National Association for the Advancement of Colored People, and the National Council of La Raza.

In order to ease the administrative burden in this proceeding, both petitions will be consolidated and assigned the same rulemaking number -- RM 8491. All future pleadings filed in this proceeding should reference this number (including the reply comments that are scheduled to be filed on July 27, 1994). Parties may inspect the pleadings in this proceeding during normal business hours, in the FCC's Record Center (Room 239), 1919 M Street, NW, Washington, D.C. 20554. Copies also can be obtained from the Commission's contractor for public service records duplication: ITS, Inc., 2100 M Street, N.W., suite 140, Washington, D.C. 20037, (202) 857-3800.

FEDERAL COMMUNICATIONS COMMISSION

Before the
Federal Communications Commission
Washington, D.C. 20554

CC Docket No. 91-281

In the Matter of

Rules and Policies Regarding
Calling Number Identification
Service - Caller ID

ORDER GRANTING MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

Adopted: July 15, 1994; Released: July 15, 1994

By the Chief, Domestic Facilities Division:

1. On March 8, 1994, the Commission adopted a *Report and Order and Further Notice of Proposed Rulemaking*, FCC 94-59, released March 28, 1994, adopting rules to establish a federal policy regarding calling number identification. Public notice of this action appeared in the Federal Register on April 18, 1994, 59 FR 18318. Petitions for reconsideration of the *Report and Order* were filed May 18, 1994, and notice of the filing of these petitions appeared in the Federal Register on June 23, 1994, 59 FR 32430.

2. On July 11, 1994, the People of the State of California and the Public Utilities Commission for the State of California ("petitioner") filed a motion requesting that the time for filing replies in the above-captioned proceedings be extended from July 18, 1994, to August 17, 1994. In support of its request, the State of California and the California Public Utilities Commission states that due to the voluminous record on reconsideration and the complexity of the issues involved in the proceeding, a grant of the requested extension is likely to improve the quality of the replies filed and assist the Commission in its consideration of pending petitions for reconsideration.

3. As set forth in Section 1.46 of the Commission's Rules, 47 C.F.R. Section 1.46, it is our policy that extensions of time not be routinely granted. We find, however, that the State of California and the California Public Utilities Commission have shown good cause for the requested extension. In reviewing the record to date in this proceeding, we agree with the State of California and the California Public Utilities Commission that the public interest will be best served by granting a 30 day extension of time to file replies to oppositions to petitions for reconsideration in this proceeding. Accordingly, we will grant the requested relief.

4. Accordingly, IT IS ORDERED that the Request for Extension of Time filed by Petitioners IS GRANTED.

5. IT IS THEREFORE ORDERED that the date for filing replies to oppositions to petitions for reconsideration in this proceeding IS EXTENDED to August 17, 1994.

6. This action is taken pursuant to authority found in Sections 4(i) and (r)) of the Communications Act of 1934, as amended. 47 U.S.C. Sections 4(i) and 303(r) and Sections 0.204(b), 0.283 and 1.46 of the Commission's Rules, 47 C.F.R. Sections 0.204(b), 0.283 and 1.46.

7. For further information concerning this proceeding, contact Suzanne Hutchings, Domestic Facilities Division, Common Carrier Bureau, (202) 634-1802.

FEDERAL COMMUNICATIONS COMMISSION

James R. Keegan
Chief, Domestic Facilities Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

CC Docket No. 94-81

In the Matter of

GTE Telephone Operating Companies — Transmittal Nos. 873, 874, 893

Revisions to Tariff F.C.C. No. 1

ORDER

Adopted: July 14, 1994; Released: July 14, 1994

By the Acting Chief, Common Carrier Bureau:

I. INTRODUCTION

1. On April 22, 1994, GTE Telephone Operating Companies (GTOC), on behalf of the General Telephone Company of California (GTECA), filed Transmittal No. 873 to establish video channel service for Apollo CableVision, Inc. (Apollo), a cable company providing cable service in Cerritos, California. On that same day, GTECA also filed Transmittal No. 874 to provide this same service to an affiliated company, GTE Service Corporation (Service Corp.). Four parties, Apollo, MCI Telecommunications Corporation (MCI), National Cable Television Association, Inc. (NCTA), and the City of Cerritos, California (the City), filed petitions to reject or suspend and investigate Transmittal 873 and/or 874.

2. GTE states that it has submitted these two tariff transmittals to enable Apollo and Service Corp. to continue providing cable service to Cerritos subscribers after the previous grants of Commission authority expire, on July 17, 1994.[1] As discussed below, we find that Transmittal 874 violates the Communications Act and our rules, and that Transmittal 873 raises serious questions that require further investigation. We, accordingly, take action on these tariffs to enforce the law while minimizing disruption of service to cable subscribers. Specifically, for reasons set forth below, we reject Transmittal 874. We advance the effective date of Transmittal 873 for one day, suspend Transmittal 873 for one day, impose an accounting order, and initiate an investigation. We also grant temporary extensions of regulatory approvals to permit GTECA to provide channel service to Apollo during the investigation and to Service Corp. for 60 days so that it can come into compliance with the telephone-cable cross-ownership restriction without abruptly terminating cable programming service to subscribers in Cerritos.

II. BACKGROUND

3. In 1988, GTECA sought authority, pursuant to Section 214 of the Communications Act, as amended (Act), 47 U.S.C. § 214, to construct and maintain a 78-channel cable network in Cerritos, California. The intended customers of the service offering were Apollo Cablevision (Apollo), the cable franchisee in Cerritos, and Service Corp.[2] GTECA contracted with Apollo's parent company, T.L. Robak, Inc. (Robak), to construct the network. The Common Carrier Bureau (Bureau) found that the construction contract between GTECA and Robak would create a relationship between the two other than a "carrier-user relationship," and thus GTECA's proposal would violate the cable-telephone cross-ownership rules and the Cable Act of 1984.[3]

4. Because the City of Cerritos had concluded that no one other than GTECA had made an adequate response to the City's request for proposals to provide cable service in Cerritos, however, the Bureau found that video service "demonstrably could not exist" unless GTECA's proposal went forward.[4] Therefore, the Bureau found that GTECA had met the standard established in Section 63.56 of the Commission's Rules for waiver of the cross-ownership rules.[5] The Bureau granted GTECA a Section 214 authorization to construct and operate the Cerritos system, subject to a limited waiver of the cross-ownership rules.[6] Among other things, this waiver permitted Service Corp. to conduct tests using the network, but prohibited GTECA from allocating the costs associated with Service Corp.'s provision of cable service to regulated accounts.[7] The Bureau required GTECA to file annual reports regarding Service Corp.'s use of the network.[8] On review, the Commission also found that grant of a waiver of the cross-ownership rules was warranted, but imposed additional conditions, including limiting the waiver to five years from the release date of the Order, which period is due to expire on July 17, 1994.[9]

5. NCTA sought judicial review of the Commission's decision to authorize the Cerritos system and to waive the cross-ownership rules. The Court found that there was good cause for grant of a waiver of the cross-ownership rules to permit Service Corp. to conduct the authorized tests, but remanded the case to the Commission because the Commission had not adequately explained why it was necessary for GTECA to hire Robak to construct the sys-

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[1] Transmittal No. 873, Description and Justification (D&J) at 1; Transmittal No. 874, Description and Justification (D&J) at 1.

[2] General Telephone Company of California, 3 FCC Rcd 2317 (Com. Car. Bur. 1988) (*Waiver Order*).

[3] *Id.* at 2319 (para. 20). *See* Section 613(b)(1) of the Cable Act of 1984, 47 U.S.C. § 533(b)(1); Section 63.54 of the Commission's Rules, 47 C.F.R. § 63.54.

[4] *Id.* at 2322 (para. 35).

[5] *Id.* at 2323 (paras. 35-37).

[6] *Id.* at 2323 (para. 37).

[7] *Id.* at 2323 (paras. 39-41). Under its testing authority, Service Corp. has provided a near video on demand service it calls "Center Screen." *See* Letter from John F. Raposa, GTOC, to Acting Chief, Common Carrier Bureau (June 14, 1994).

[8] *Id.* at 2323 (para. 41).

[9] General Telephone Company of California, 4 FCC Rcd 5693, 5700-01 (paras. 50-61) (1989) (*Waiver Review Order*).

tem.[10] The Court hypothesized that the benefits of the Cerritos system could have been achieved without the cross-ownership waiver if it were possible for GTECA to hire someone other than an affiliate of the cable programming provider for this construction project.[11]

6. On remand, the Commission found that it was not necessary for GTECA to hire Robak to build the cable network, and, therefore, rescinded GTECA's cross-ownership waiver and Section 214 authorization.[12] The Commission declined to order GTECA to divest its Cerritos facilities. Rather, the Commission "simply direct[ed] GTECA to take steps necessary to achieve compliance with the telephone company/cable television cross-ownership restriction."[13] The Commission also required GTECA to explain how it planned to comply with the Commission's cable-telephone cross-ownershipp requirements.[14]

7. GTECA filed a petition for stay of the *Remand Order*, and the Commission denied GTECA's request.[15] On January 5, 1994, the Court of Appeals for the Ninth Circuit stayed the effectiveness of the *Remand Order* pending judicial review.[16]

III. TARIFF FILINGS

8. Through Transmittal 873, GTECA proposes to convert the contractual arrangement with Apollo, established pursuant to the cross-ownership waiver in 1989, to a tariffed common carrier service which it calls video channel service.[17] GTECA contemplates that Apollo would use this tariffed service to continue to provide cable service to Apollo subscribers. In Transmittal 874, GTECA proposes to provide channel service to its affiliate, Service Corp., which would permit it to continue to provide video-on-demand service to subscribers in Cerritos. Video channel service would provide transmission of cable television signals from Apollo's and Service Corp.'s locations to subscribers' homes. Under both Transmittals 873 and 874, GTECA plans to charge $81,764 per month for this service.[18] In Transmittal 874, GTECA states that the rates, terms, and conditions governing the provision of video channel service to Service Corp. are identical to those set forth in Transmittal 873 under which service will be furnished to Apollo.[19] GTECA notes that, in 1992, Apollo prepaid its monthly payment obligations under the contract for the remainder of the 15 year contract term. Thus, GTECA concludes that if Transmittal 873 takes effect, Apollo will have already prepaid for video transmission service through May 2, 2006.[20]

9. MCI and Apollo argue that both Transmittals 873 and 874 should be rejected, while NCTA petitions against only Transmittal 874. The City of Cerritos requests that we suspend and investigate both transmittals. The City also requests that we extend GTECA's waiver of the cable-telephone cross-ownership rules, granted in 1989 for five years, in order to avoid disruption of cable service.[21]

IV. DISCUSSION

A. Need for Section 214 Authorization

10. *Pleadings.* Section 214 of the Communications Act, 47 U.S.C. § 214, requires all carriers to obtain authorization from the Commission prior to constructing or extending any line or engaging in transmission over any such new or extended line. MCI maintains that Transmittals 873 and 874 must be rejected because after the waiver expires on July 17, 1994, GTECA will no longer have Section 214 authorization to operate its Cerritos system.[22] GTECA contends that its Section 214 authority was not limited to five years, but rather that only its waiver was.[23] GTECA also contends that the stay of the *Remand Order* was intended to maintain the *status quo* pending judicial review, so that the Section 214 authorization would remain in effect while the stay is in effect.[24]

11. *Discussion.* We reject GTECA's argument that its Section 214 authority does not expire on July 17. GTECA explicitly concedes that the waiver of the telephone-cable cross-ownership rule granted to GTECA in 1989 expires, by its terms, on July 17. Moreover, the Section 214 authority granted to GTECA was expressly conditioned on the issuance of the waiver.[25] Because the Commission's rules bar GTECA from operating its Cerritos system in the absence of a waiver, we conclude that GTECA's Section 214 authority will also expire on July 17.

12. We also have significant doubts about GTECA's claim that the Ninth Circuit's stay of the *Remand Order* in effect continues GTECA's Section 214 authority to operate the Cerritos facilities during the pendency of that review proceeding. We are, however, unable to determine the legal status of the Section 214 authority based on the current record. Therefore, we make no finding in this Order as to the effect of the Court's stay on the expiration of GTECA's Section 214 authority. On our own motion, we grant GTECA an interim Section 214 authorization to permit GTECA to provide video channel service while we consider this issue further in the context of our investigation of Transmittal 873. We also grantx interim Section 214 authority for 60 days to provide service to Service Corp. under Transmittal 874 to give GTE time to bring itself into compliance with the telephone-cable cross-ownership rule. GTECA is directed by this Order, and other parties participating in this tariff proceeding are invited, to submit briefs to the Commission addressing this issue further.

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[10] National Cable Television Ass'n v. FCC, 914 F.2d 285, 288-89 (D.C. Cir. 1990) (*NCTA v. FCC*).
[11] *NCTA v. FCC*, 914 F.2d at 288-90.
[12] General Telephone Company of California, 8 FCC Rcd 8178, 8181 (para. 13) (1993) (*Remand Order*).
[13] *Id.* at 8182 (paras. 16-17).
[14] *Id.*
[15] General Telephone Company of California, 8 FCC Rcd 8753 (1993) (*Stay Order*).
[16] *See* Transmittal 873 D&J at 3; MCI Petition at 5; NCTA Petition at 2; City Petition at 12.
[17] Transmittal 873 D&J at 4.
[18] *Id.* at 8.
[19] Transmittal 874 D&J at 1.
[20] *Id.* at 8-9.
[21] City Petition at 3-4, 15-16.
[22] MCI Petition at 6-7.
[23] *Id.* at 8.
[24] GTECA Opposition at 9.
[25] *Waiver Review Order*, 4 FCC Rcd at 5700 (para. 50) ("The grant of a waiver for good cause permits us to grant the Section 214 coaxial cable and fiber optic cable applications for General's Cerritos project.")

B. Transmittal 874: Service to GTECA Affiliate

13. *Pleadings.* MCI and NCTA argue that Transmittal 874 must be rejected because it would violate the bar against telephone-cable cross-ownership established in the Cable Act of 1984.[26] MCI argues that, because Service Corp.'s video programming tests are almost complete, the justification GTECA relied on originally to obtain the waiver no longer exists.[27]

14. In reply, GTECA does not dispute MCI's assertion that the programming and technical tests have almost been completed. Instead, GTECA argues that the Commission has no authority under the Cable Act of 1984 to reject Transmittal 874, because such action would unlawfully restrict GTECA's exercise of its First Amendment rights.[28] GTECA also asserts that the Commission argued in its brief in *NCTA v. FCC* that Service Corp. is not a "cable operator" and does not provide "cable service" within the meaning of the Cable Act of 1984.[29]

15. The City of Cerritos asks the Commission to extend the cross-ownership waiver and require GTECA to continue offering service to maintain the status quo. Alternatively, if the waiver is not extended, the City advocates suspension and investigation rather than rejection of Transmittal 874. The City asserts that these actions are necessary to prevent disruption of cable service to customers in Cerritos.[30]

16. *Discussion.* Transmittal 874 by its terms expressly provides transmission service to an affiliate of GTECA for the delivery of video programming. "Video programming" is defined in the Communications Act as "programming provided by, or generally considered comparable to programming provided by, a television broadcast station."[31] Neither GTECA nor any other party has contended that the movies shown through Service Corp.'s near-video-on-demand service should not be "generally considered comparable" to movies shown by television broadcast stations. This near-video-on-demand service is video programming within the meaning of the Communications Act. The involvement of Service Corp., an affiliate of GTECA, with the provision of video programming violates Sections 63.54 and 63.55 of the Commission's Rules, 47 C.F.R. § 63.54, 63.55, and Section 533(b) of the Communications Act, 47 U.S.C. § 613(b), absent a waiver. As previously indicated, after July 17, 1994, GTECA's waiver of Sections 63.54 and 63.55 of the Commission's Rules will expire by its terms. We therefore conclude that Transmittal 874 is patently unlawful on its face and must be rejected.

17. We reject GTECA's reliance on the *C&P* case for the proposition that the cross-ownership rule is unconstitutional. In *C&P*, the Federal District Court for the Eastern District of Virginia concluded that the cross-ownership rules are an unreasonable restriction on the speech of communications common carriers, and thus violate the First Amendment.[32] The Commission found in the *Remand Order*, however, that the *C&P* case did not limit the Commission's ability to rescind the waiver in this case.[33] Moreover, the Commission has previously stated that the cross-ownership rule is consistent with 'the First Amendment to the Constitution."[34] GTECA has provided no grounds for the Commission to revisit that determination here.

18. The Commission concluded in the *Remand Order* in November 1993 that GTECA would have to take some action to comply with the cross-ownership rules.[35] GTECA has been on notice since the original grant of the cross-ownership waiver in 1989 that this waiver will expire on July 17, 1994.[36] Neither GTECA nor Service Corp. has made arrangements to ensure the continuation of video programming service to its Cerritos subscribers upon expiration of the waiver. Nevertheless, in order to avoid an abrupt interruption of service to customers of Service Corp., we offer GTOC an opportunity to come into compliance with the Cable Act of 1984. To accomplish this result, we grant a limited waiver of the cross-ownership waiver and Section 214 authorization for a period of 60 days after the release date of this Order. During this period, Service Corp. must either find an independent third party to provide the video programming services now provided by Service Corp. or notify its customers that it has decided to terminate providing video programming services. In order to provide an orderly transition for customers, GTECA must notify each subscriber that can receive its video programming service of the action it will take to bring itself into compliance with the Act, and to provide each subscriber a copy of this Order upon request. We require GTECA to submit a copy of its proposed notification for our review and approval prior to giving the notice to its customers.

19. The City of Cerritos has asked us to extend GTECA's waiver while any investigation of Transmittal 873 is pending, in order to prevent disruption of cable service.[37] Because we find that such an indefinite extension would not be consistent with the D.C. Circuit's mandate in *NCTA v. FCC*, we must deny this request.

C. Transmittal 873: Service to Apollo

20. In this section, we address issues raised by petitioners with respect to Transmittal 873. The petitioners also raised many of these issues with respect to Transmittal 874. Because we determined above that Transmittal 874 should be rejected as patently unlawful, however, we do not need to reach any of the other issues raised with respect to that filing.[38]

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[26] MCI Petition at 4-6; NCTA Petition at 3-4. *See* 47 U.S.C. § 533(b)(1); 47 C.F.R. § 63.54.

[27] MCI Petition at 6, *citing* Telecommunications Reports, 36-37 (Apr. 4, 1994).

[28] GTECA Opposition at 3-6, *citing* C&P v. United States, 830 F. Supp. 909 (E.D. Va. 1993), *appeal pending* No. 93-2340 (4th Cir.) (*C&P*). This appeal has been stayed while Congress considers whether to adopt legislation in this area. Chesapeake and Potomac Telephone Company v. United States, Docket No. 93-2340(L) (CA-92-1751-A), (4th Cir., June 15, 1994).

[29] GTECA Opposition at 7 n.11.

[30] City Petition at 26-28.

[31] Section 522(19) of the Communications Act, 47 U.S.C. § 602(19).

[32] *C&P*, 830 F. Supp. at 926-31.

[33] *Remand Order*, 8 FCC Rcd at 8178 n.3. *See also Stay Order*, 8 FCC Rcd at 8754 n.12.

[34] *Stay Order*, 8 FCC Rcd at 8754 (para. 8).

[35] *Remand Order*, 8 FCC Rcd at 8182 (paras. 15-17).

[36] *Waiver Review Order*, 4 FCC Rcd at 5700 (para. 52).

[37] City Petition at 26-28.

[38] Specifically, we do not reach the issues of whether GTECA has adequately shown that Transmittal 874 would not enable

1. Transfer of Assets

21. *Pleadings.* In establishing its new common carrier channel service, GTECA plans to move $ 5.9 million in investment from non-regulated to regulated accounts. This investment has been used to provide service pursuant to the telephone-cable cross-ownership waiver to date.[39] GTECA also intends to establish new subaccounts in Parts 32 and 64 of the Commission's Rules, 47 C.F.R. Parts 32, 64, for video channel service.[40] MCI opposes the transfer of any Cerritos investment in coaxial cable from unregulated to regulated accounts because such a transfer would cause this investment to be recovered from ratepayers rather than shareholders. According to MCI, ratepayers are harmed because this additional investment and expense will either reduce GTECA's sharing obligations, or increase the amount by which GTECA could increase rates if it were eligible to make a lower end adjustment.[41] MCI also claims that GTECA has not complied with the affiliate transaction rules, Section 32.27 of the Commission's Rules, 47 C.F.R. § 32.27, by showing that the transferred investment is the lower of either net book cost or fair market value. According to MCI, GTECA incorrectly assumes that book value is essentially equal to fair market value in this case.[42]

22. In response, GTECA asserts that no ratepayers will be harmed if it transfers these assets to regulated accounts. GTECA states that it plans to transfer investment on an adjusted net book basis, and that this investment will be directly assignable to the interstate jurisdiction.[43] GTECA argues that the transfer of all cable investment to regulated accounts is reasonable, because GTECA's customers for this service will use 100 percent of the network.[44] GTECA maintains that the transfer of these assets will not affect its price cap sharing obligation, because services priced on an individual case basis (ICB) are not incorporated into price cap indices.[45] GTECA claims that assuming that contract charges are equal to market value is reasonable, and complies with Section 32.27 of the Commission's Rules.[46]

23. On June 13, 1994, as part of its implementation of its proposed video channel service, GTECA requested a waiver of the Commission's Rules to transfer investment from nonregulated to regulated use because GTECA proposes to replace the contractual video transport agreements governing use of broadband facilities in Cerritos with a tariff for video channel service.[47] GTECA states that the investment in coaxial cable and related facilities currently used for video transport in Cerritos are the only facilities in that community suitable for provision of video channel service.[48] Therefore, GTECA asks permission to use this plant capacity, which is currently classified as nonregulated, for regulated operations.[49] Further, GTECA states that the needed capacity does not otherwise currently exist in Cerritos nor could such capacity be obtained without investment in entirely new facilities.[50] Apollo opposes this request.

24. *Discussion.* Under Section 32.23 of the Commission's Rules, LECs are required to make forecasts of investment for nonregulated activities on a three year basis, and must obtain a waiver to shift investment from non-regulated to regulated accounts in a way inconsistent with this forecast.[51] With respect to GTE's waiver request, we note that in the *Joint Cost Order*, the Commission was concerned that (1) costs associated with an investment be allocated between regulated and nonregulated operations on the basis of projected relative use and not on the actual relative use; and (2) costs actually being incurred for the benefit of the nonregulated operation not be borne by the regulated operation because the carrier underestimated the projected nonregulated use.[52] It is not clear from the face of GTECA's waiver request whether GTECA has made reasonable projections of relative regulated and nonregulated use, or whether the proposed transfer might result in regulated customers bearing unregulated costs. Because the issues raised by GTECA's proposed investment transfer are interrelated with the other issues raised by Transmittal 873, we include the issues raised by GTECA's waiver petition among the issues designated for investigation in this proceeding.

2. Apollo Contract

25. *Pleadings.* Currently, GTECA's provision of cable transmission service to Apollo is governed by contractual agreements established shortly after the Commission granted GTECA waiver of the cross-ownership rule and Section 214 authority. Apollo argues that GTECA proposes in Transmittal 873 to modify the terms of the contractual arrangement unilaterally through a tariff filing, in violation of the *Sierra-Mobile* doctrine. Apollo explains that the *Sierra-Mobile* doctrine was established by the Supreme Court in two companion cases in 1956, which held that carriers

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Service Corp. to cross-subsidize competitive video programming services with other noncompetitive services. *See* Apollo Petition at 20-24, City Petition at 18-19. We also do not decide whether the monthly charges to Service Corp. under Transmittal 874 would be unequal to Apollo's lump-sum payment for service under Transmittal 873, and thus unreasonably discriminatory. *See* MCI Petition at 2-3. Finally, we need not determine whether Transmittal 874 would have resulted in wasteful duplication of facilities. *See* Apollo Petition at 5-6, 25-26; City Petition at 16-18.

[39] Transmittal 873, D&J at 7-8.

[40] *Id.*

[41] MCI Petition at 8.

[42] *Id.* at 9.

[43] GTECA Opposition at 20.

[44] *Id.* at 21.

[45] *Id.*

[46] *Id.* at 23-24.

[47] GTECA Waiver Petition at 3. Specifically, GTECA seeks waiver of Sections 32.23(b), 32.27(b), 64.901, and 64.902 of the Commission's Rules, 47 C.F.R. §§ 32.23(b), 32.27(b), 64.901, 64.902. Apollo submitted an opposition to GTECA's waiver request to the Bureau one day late, on June 30, 1994. Motions for extension of time are not routinely granted. *See* Section 1.46(a) of the Commission's Rules, 47 C.F.R. § 1.46(a). Because it appears that no party will be prejudiced by Apollo's delay, however, we will consider Apollo's opposition when considering the issue regarding GTECA's waiver request designated for investigation below.

[48] GTECA Waiver Petition at 3.

[49] *Id.* at 4.

[50] *Id.*

[51] *See* Separation of Costs of Regulated Telephone Service from Costs of Nonregulated Activities, CC Docket No. 86-111, 2 FCC Rcd 1298, 1320 (para. 169 and n.284) (1987) (*Joint Cost Order*).

[52] *Joint Cost Order*, 2 FCC Rcd at 1320 (paras. 169-170).

are prohibited under the Natural Gas Act and the Federal Power Act from abrogating or modifying contract provisions by filing tariffs.[53]

26. Apollo also maintains that the Commission requires carriers to show "substantial cause" before it will permit those carriers to revise tariffs in the middle of a long-term agreement.[54] According to Apollo, its contractual arrangement with GTECA was intended to be in effect until 2006, and GTECA has made no showing of substantial cause that would justify abrogation of the terms of the contract.[55] Apollo argues that the policy reasons for the substantial cause test are more compelling with respect to contract services than they are for tariffed services.[56]

27. In addition, Apollo maintains that many of the tariff provisions are different from current contract provisions. Specifically, Apollo states that since it would no longer be responsible for maintaining and repairing the Cerritos cable facilities, providing cable converter boxes to subscribers, or billing and collecting charges for cable services from subscribers, it would no longer receive revenue from GTECA for performing these services.[57] Similarly, the City maintains that several provisions of the franchise agreements with Apollo and GTECA are not reflected in the tariffs.[58]

28. In reply, GTECA argues that the *Sierra-Mobile* doctrine does not apply here. GTECA asserts that the governing case is *Armour Packing v. United States*,[59] which states that a properly filed tariff, rather than a contract, establishes the legal rate for common carrier services provided to an end user customer.[60] According to GTECA, the *Sierra-Mobile* doctrine is applicable only to carrier-to-carrier contracts. GTECA further argues that *Sierra-Mobile* is not applicable because it is not acting "unilaterally," but rather is acting to comply with Commission rules.[61] GTECA also argues that the *RCA* substantial cause test is not applicable because it is acting to comply with Commission rules, not based upon its own business needs or objectives.[62]

29. GTECA further argues that the terms of the contract permit either GTECA or Apollo to terminate the installation agreement at any time.[63] GTECA contends that carriers usually provide maintenance, installation, and repair services in conjunction with common carrier services.[64] GTECA also denies that Apollo will be harmed by its assumption of maintenance functions. Although GTECA concedes that Apollo will lose revenue as a result of this, GTECA asserts that Apollo will also avoid the costs associated with maintenance and installation.[65] GTECA further denies that the tariff would alter the decoder box agreement with Apollo, and also notes that decoders are unregulated and thus the costs of these decoders are not recovered in the tariffed rate.[66]

30. *Discussion.* First, it is not clear from the record before us whether and to what extent the terms and conditions of Transmittal 873 are different from the terms and conditions established by the contractual arrangement between GTECA and Apollo. Second, the Commission has never applied the substantial cause test to a long-term carrier-customer contract such as that before us now. Similarly, it is not clear whether or how the *Sierra-Mobile* line of cases or the *Armour Packing* case apply to the GTECA-Apollo contracts. If we conclude either that the substantial cause test should be extended to this case, or that the *Sierra-Mobile* doctrine is applicable here, then the rates, terms, and conditions in Transmittal 873 cannot be lawful. Therefore, these legal issues must be resolved before we can find that Transmittal 873 is not unlawful. Accordingly, we direct GTECA, and invite other participants in this tariff proceeding, to submit briefs addressing these legal issues.

3. Common Carriage

31. *Pleadings.* Apollo also argues that GTECA's service is a private, not a common carrier, service and, therefore, tariffs offering a private service are not lawful. Apollo asserts that the nature of the service rather than the identity of the carrier determines whether the service is a common carrier or private carrier service.[67] Apollo contends that, under the terms of both the contract and the tariff, the offering would be limited to two customers rather than held out generally to the public.[68] Apollo contends that GTECA's reliance on past Commission precedent authorizing common carrier channel service to justify the tariffs filed here is misplaced because the services at issue in that precedent were provided to all cable companies indiscriminately.[69]

32. GTECA responds that the Commission has found in the past that video channel service is a common carrier service properly offered pursuant to tariff.[70] GTECA also argues that there is nothing that prohibits LECs from filing

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[53] Apollo Petition at 8-9, *citing* United Gas Co. v. Mobile Gas Corp., 350 U.S. 332, 339 (1956); FPC v. Sierra Pacific Power Co., 350 U.S. 348 (1956); MCI v. FCC, 712 F.2d 517, 535 n.27 (D.C. Cir. 1983); Bell of Pennsylvania v. FCC, 503 F.2d 1250, 1282 (3d Cir. 1974), *cert. denied* 423 U.S. 886 (1975). *See also* City Petition at 20.

[54] Apollo Petition at 9-10, *citing, e.g.*, RCA American, 86 FCC 2d 1197 (1981); Showtime Networks, Inc. v. FCC, 932 F.2d 1 (D.C. Cir. 1991) (substantial cause test applied to tariffed cable services).

[55] Apollo Petition at 10-11.

[56] *Id.* at 10.

[57] *Id.* at 11-13.

[58] City Petition at 21-23, Att. A (City of Cerritos Ordinance No. 659, granting cable franchise to Apollo), Att. B (City of Cerritos Ordinance No. 658, granting cable franchise to GTECA).

[59] *Armour Packing v. United States*, 209 U.S. 56 (1908).

[60] GTECA Opposition at 11-12.

[61] GTECA Opposition at 14.

[62] *Id.* at 14 n.17.

[63] *Id.* at 15.

[64] *Id.* at 15-16.

[65] *Id.* at 16.

[66] *Id.* at 17.

[67] Apollo Petition at 14-15, *citing Southwestern Bell v. FCC*, 19 F.3d 1476 (D.C. Cir. 1994) (*Dark Fiber Remand Order*); *cited in* City Petition at 20-21.

[68] Apollo Petition at 15-16.

[69] *Id.* at 16-18.

[70] GTECA Opposition at 9-11, *citing* Ohio Bell Telephone Co., 1 FCC Rcd 942 (Com. Car. Bur. 1986); Pacific Bell Telephone Co. 60 Rad. Reg.2d 1175 (Com. Car. Bur. 1986); C&P Telephone Co., 60 Rad. Reg.2d 1003 (Com. Car. Bur. 1985); Commission Order, Dated April 6, 1966, Requiring Common Carriers To File Tariffs With Commission for Local Distribution Channels for Use in CATV Systems, 4 FCC 2d 257 (1966); General Telephone Company of California, Docket No. 17333, 13 FCC 2d 448 (1968).

individually negotiated rates in tariffs.[71] On July 12, 1994, GTOC filed Transmittal No. 893, to remove language from Transmittal No. 873 limiting the offering to one customer, and to make the offering generally available.

33. *Discussion.* We have reviewed Transmittal 873 and the revision to that Transmittal filed by GTECA, as well as all associated pleadings. We conclude that, as revised, GTECA's tariff is not so patently unlawful as to warrant rejection, and that an investigation of this issue is not warranted at this time. Accordingly, we will not designate this as an issue for investigation.

V. LEGAL ISSUES FOR RESOLUTION

34. As discussed above, there are a number of legal issues which GTECA and commenting parties should brief to aid us in reaching a legal conclusion on these issues. These issues are set forth below:

Issue 1. Does the Court of Appeals' stay of the *Remand Order* continue the Section 214 authorization in effect until judicial review is complete, or does the authorization terminate on July 18, 1994?

Issue 2. Is it lawful for GTECA to supersede the Apollo contracts with the tariff filing in Transmittal No. 873?

VI. FACTUAL ISSUES DESIGNATED FOR INVESTIGATION

35. The following are the issues raised by Transmittal 873 that we designate for investigation:

Issue 1. Is GTECA's transfer of investment from unregulated to regulated accounts reasonable?

In order to fully investigate the petition for waiver of the Commission's rules to transfer investment from unregulated to regulated accounts, we direct GTECA to provide the following information in its direct case:

- The original cost and the associated accumulated depreciation of the plant being transferred, by Part 32 account.
- The depreciated baseline cost of the transferred plant, as of the date of transfer.
- The date the plant was placed in service.
- The net book value of the transferred plant, specified as depreciated cost minus deferred tax liabilities, as of the date of transfer.
- The estimated fair market value of the plant as of the date of the proposed transfer.
- The cost pools in GTE's Part 64 cost allocation manual to which the plant is to be transferred.

Parties are invited to comment on the information provided by GTECA in its direct case and in its petition for waiver. During the pendency of this investigation, we also require GTECA to keep accurate account of the costs associated with this service separate from other costs.

Issue 2. Are the rates and terms proposed in Transmittal 873 reasonable?

GTECA bases its rates in Transmittal 873 on the lease charges contained in the Apollo contract; and those charges were calculated to be equal to half of the total construction costs, to be collected over a 15 year period plus interest at a rate of 18.9 percent.[72] GTECA also states that, because Transmittal 873 is priced on an individual case basis, the service will not be incorporated into its price cap indexes.[73] Parties are directed to discuss whether such a rate computation is reasonable. For example, the Commission limited a price cap carrier's cost of money factor in a new service cost justification to 11.25 percent, and the Commission prescribed a rate of return of 11.25 percent for LECs not subject to price caps.

Parties are also directed to discuss the extent to which the terms and conditions of Transmittal 873 are inconsistent with the contractual arrangement with Apollo.

Issue 3. Under Transmittal 873, will the relationship between GTECA and Apollo be exclusively a "carrier-user" relationship, apart from the effect of Robak's role in the construction, as required by Section 63.54 of the Commission's Rules?

After Transmittal 873 takes effect, it appears that GTECA plans to continue to provide to Apollo the use of cable converter boxes, the boxes necessary to convert cable signals into a format that can be displayed on subscribers' television sets, on a non-regulated basis. Also, it appears that GTECA plans to continue to sub-lease space from Apollo at the location where Apollo receives satellite signals for distribution over the cable network. Thus, there is a substantial question whether these relationships violate the telephone-cable cross-ownership rule.

Section 63.54(c) of the Commission's rules, the telephone-cable cross-ownership rule, bars any financial or business relationship between a common carrier and a video programming provider except a carrier-user relationship. In *NITCO*, the Commission explained that the carrier-user relationship exception of Section 63.54 contemplates transactions that entail a general offer to provide on an indiscriminate basis substantially the same service or services to any and all similarly situated companies or members of the public.[74] The Commission found that seven separate relationships between a telephone company and a cable company, including the lease of space, exceeded the carrier-user relationship and, therefore, violated Section 63.54.[75]

GTECA shall explain in its direct case why its lease of space and provision of converter boxes on a non-common carrier basis are consistent with Section 63.54 of the Com-

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[71] GTECA Opposition at 10. GTECA interprets the *Dark Fiber Remand Order* as finding that the Commission did not justify its conclusion that dark fiber is a common carrier service, rather than that ICB rates may not be filed in tariffs.

[72] GTECA Opposition at 22-23. The rates were based on half the construction costs because GTECA assumed both Apollo and Service Corp. would be using half the channels available in the Cerritos network. *Id.*

[73] GTECA Opposition at 21.

[74] *CCI Cablevision v. Northwestern Indiana Telephone Company, Inc.*, 3 FCC Rcd 3096, 3097 (para. 8) (1988), *aff'd*, 872 F.2d 465 (D.C. Cir. 1989), *cert. denied*, 493 U.S. 1035 (1990) (*NITCO*).

[75] *Id.*

mission's Rules. In the alternative, GTECA may make alternative arrangements with Apollo to terminate these relationships with Apollo.

VII. PROCEDURAL MATTERS

A. Filing Schedules

36. This investigation will be conducted as a notice and comment proceeding to which the procedures set forth in this Order shall apply. We require GTOC to file a direct case addressing each issue designated above no later than **August 15, 1994**. Moreover, the direct case must supply all information upon which GTOC relies to support its position. Pleadings responding to the direct case may be filed no later than **September 15, 1994**, and must be captioned "Opposition to Direct Case" or "Comments on Direct Case." GTOC may file a "Rebuttal" to oppositions or comments no later than **September 30, 1994**.

37. Parties briefing any or all of the legal issues for which we solicited further discussion must file those briefs on or before **August 15, 1994**. Parties may address all the legal issues in the same brief, and may address these issues in the same pleadings filed in the investigation discussed above. Comments on these briefs may be filed on or before **September 15, 1994**, and reply comments may be filed on or before **September 30, 1994**.

38. An original and seven copies of all pleadings must be filed with the Secretary of the Commission. In addition, one copy must be delivered to the Commission's commercial copying firm, International Transcription Service, Room 246, 1919 M Street, N.W., Washington, D.C. 20554. Also, one copy must be delivered to the Tariff Division, Room 518, 1919 M Street, N.W., Washington, D.C. 20554. Members of the general public who wish to express their views in an informal manner regarding the issues in this investigation may do so by submitting one copy of their comments to the Secretary, Federal Communications Commission, 1919 M Street, N.W., Room 222, Washington, D.C. 20554. Such comments should specify the docket number of this investigation.

39. All relevant and timely pleadings will be considered by the Commission. In reaching a decision, the Commission may take into account information and ideas not contained in pleadings, provided that such information or a writing containing the nature and source of such information is placed in the public file, and provided that the fact of reliance on such information is noted in the order.

B. *Ex Parte* Requirements

40. *Ex parte* contacts (*i.e.*, written or oral communications which address the procedural or substantive merits of the proceeding which are directed to any member, officer, or employee of the Commission who may reasonably be expected to be involved in the decisional process in this proceeding) are permitted in this proceeding until the commencement of the Sunshine Agenda period. The Sunshine Agenda period terminates when a final order is released and the final order itself is issued. Written *ex parte* contacts and memoranda summarizing oral *ex parte* contacts must be filed on the day of the presentation with the Secretary and Commission employees receiving each presentation. For other requirements, *see generally* Section 1.1200 *et seq.* of the Commission's Rules, 47 C.F.R. §§ 1.1200 *et seq.*

VIII. ORDERING CLAUSES

41. Accordingly, IT IS ORDERED that the petitions to reject or suspend and investigate GTE Telephone Operating Companies Tariff F.C.C. No. 1, Transmittal Nos. 873 and 874, filed by MCI Telecommunications Corporation; National Cable Television Association, Inc.; Apollo CableVision; and the City of Cerritos, California ARE GRANTED, to the extent indicated above, and are otherwise DENIED.

42. IT IS FURTHER ORDERED that, pursuant to Section 533(b) of the Communications Act, 47 U.S.C. § 613(b), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, GTE Telephone Operating Companies Tariff F.C.C. No. 1, Transmittal No. 874, IS REJECTED.

43. IT IS FURTHER ORDERED that the GTE Telephone Operating Companies SHALL FILE tariff revisions, within ten days of the release date of this Order, to become effective on one day's notice, to remove the unlawful portions of the tariff.

44. IT IS FURTHER ORDERED that, pursuant to Section 204(a) of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, GTE Telephone Operating Companies, Transmittal No. 873, IS SUSPENDED for one day and an investigation of the referenced tariff transmittal, and any future tariff revisions modifying that transmittal, IS INSTITUTED.

45. IT IS FURTHER ORDERED that GTE Telephone Operating Companies SHALL FILE tariff revisions reflecting this suspension no later than ten days from the release date of this order. GTE Telephone Operating Companies are directed to file a supplement to its tariff, to be effective on one day's notice, in order to advance the effective date of Transmittal No. 873 to July 17, 1994, and then suspend the same for one day until July 18, 1994.

46. IT IS FURTHER ORDERED that GTE Telephone Operating Companies SHALL FILE a brief addressing each of the legal issues discussed in Section V of this Order. Other parties participating in this investigation may file a brief addressing each of the legal issues discussed in Section V of this Order.

47. IT IS FURTHER ORDERED, pursuant to Sections 4(i), 4(j), 201(b), 203(c), 204(a), 205, and 403 of the Communications Act, 47 U.S.C. §§ 154(i), 154(j), 201(b), 203(c), 204(a), 205, and 403, that the issues set forth in Section VI of this Order ARE DESIGNATED FOR INVESTIGATION.

48. IT IS FURTHER ORDERED that GTE Telephone Operating Companies SHALL BE a party to this proceeding.

49. IT IS FURTHER ORDERED that GTE Telephone Operating Companies SHALL INCLUDE a response to each item of information requested in this Order.

50. IT IS FURTHER ORDERED that pursuant to Section 204(a) of the Communications Act of 1934, 47 U.S.C. § 204(a), GTE Telephone Operating Companies shall keep accurate account of all earnings, costs, and returns associated with the rates that are the subject of this investigation.

51. IT IS FURTHER ORDERED that GTE SHALL COME INTO COMPLIANCE with the telephone company-cable television cross-ownership restrictions of Sections 63.54 and 63.55 of the Commission's Rules, 47 C.F.R. §§ 63.54, 63.55, and Section 533(b) of the Communications Act, 47 U.S.C. § 613(b), within 60 days from the date this decision is released.

52. IT IS FURTHER ORDERED that pursuant to Section 1.3 of the Commission's Rules, 47 C.F.R. § 1.3, GTE Telephone Operating Companies ARE GRANTED a limited waiver of Sections 63.54 and 63.55 of the Commission's Rules, to expire 60 days after the release date of this Order, for the purpose of coming into compliance with the telephone company-cable television cross-ownership rules.

53. IT IS FURTHER ORDERED that pursuant to Sections 4(i) and 214 of the Communications Act, 47 U.S.C. §§ 154(i), 214, GTE Telephone Operating Companies ARE GRANTED interim authority to provide the service described in its Transmittal No. 873, during the pendency of this investigation.

54. IT IS FURTHER ORDERED that pursuant to Sections 4(i) and 214 of the Communications Act, 47 U.S.C. §§ 154(i), 214, GTE Telephone Operating Companies ARE GRANTED interim authority to provide the video channel service to GTE Service Corporation, to expire 60 days after the release date of this Order.

55. For purposes of compliance with this Order, we waive Sections 61.56, 61.58 and 61.59 of the Commission's Rules, 47 C.F.R. §§ 61.56, 61.58, 61.59. GTE Telephone Operating Companies should cite the "DA" number of this Order as the authority for these filings.

FEDERAL COMMUNICATIONS COMMISSION

A. Richard Metzger, Jr.
Acting Chief,
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In Re Application of

SALT OF THE EARTH
BROADCASTING, LTD.
(Assignor)

and File No. BALCT-930416KF

SALT OF THE EARTH
BROADCASTING CORP.
(Assignee)

For Consent to Assign
the License for Station
WSNR-TV, Channel 43,
Syracuse, NY

MEMORANDUM OPINION AND ORDER

Adopted: July 11, 1994; Released: August 1, 1994

By the Commission: Commissioner Barrett concurring and issuing a statement.

1. The Commission has before it the above-noted application to assign the license of Station WSNR-TV (Channel 43, IND) Syracuse, New York, from Salt of the Earth Broadcasting, Ltd. ("SEBC Ltd.") to Salt of the Earth Broadcasting Corp. ("SEBC"). Craig L. Fox, one of SEBC's principals (with a 49% ownership interest) also controls Station WOLF(AM), in Syracuse, New York. Mr. Fox also has an option to acquire control (51%) of SEBC. Because the common ownership of co-located television and radio stations falls under the prohibitions of the Commission's one-to-a-market rule, 47 C.F.R. §73.3555(c), SEBC has requested a permanent waiver of that rule to permit SEBC to acquire the station. SEBC's request for a waiver and its assignment application are unopposed.

2. In our *Amendment of Section 73.3555--Second Report and Order* in MM Docket No. 87-7 (*"Second Report"*), 4 FCC Rcd 1741, *recon. in part*, 4 FCC Rcd 6489 (1989), we modified the waiver standard for cases implicating the one-to-a-market rule. In particular, we indicated that we would look favorably upon waiver applications involving radio and television station combinations in the top 25 television markets where at least 30 separately owned, operated, and controlled broadcast licensees or "voices" would survive a proposed merger. We also stated that we would look favorably on waiver requests involving "failed" broadcast stations. Waiver requests not dependent on either of these two circumstances, we decided, would be evaluated on a case-by-case basis according to five public interest criteria, namely: 1) the potential benefits of joint operations of the facilities; 2) the types of facilities involved; 3) the number of media outlets already owned by the applicant in the relevant market; 4) any financial difficulties suffered by the stations involved; and 5) the nature of the market--that is, the level of competition and diversity after the requested merger would be completed, based on both broadcast and other media voices. Additionally, the benefits of the proposed combination would be weighed against any possible diminution of diversity and economic competition to determine whether, on balance, grant of the waiver request would serve the public interest. Because Syracuse is ranked 68th among Arbitron television markets, and no claim of a "failed" station is made, SEBC must demonstrate that its waiver request is in the public interest under the case-by-case criteria described above.

3. In support of its waiver request, SEBC asserts that overall, grant of the proposed transaction will provide a number of public service benefits. First, SEBC points to our recognition that common operation of radio and television stations in the same market would result in economies of scale, principally due to shared facilities and staff. *See Second Report*, at 1746-50. SEBC states that WSNR-TV presently operates primarily as a "video juke box," which provides music videos aired through the use of a computerized system which permits the local audience to make selections by calling a telephone "900" number. SEBC represents that WSNR-TV has never employed a sales staff and has always relied on the video juke box revenues to cover its expenses. Consequently, SEBC states, WSNR-TV cannot compete with the other independent television station in its market for better programming. SEBC asserts that a waiver of the one-to-a-market rule would permit WSNR-TV to share studios and staff with WOLF(AM), and the ability to use WOLF(AM)'s sales staff in particular would permit WSNR-TV to present a wider variety of programming. Specifically, SEBC represents that combined operations will result in an annual savings of $36,000.00 in rental of building space, $8,400.00 annual savings in utility costs, and $112,700.00 annual savings in salaries for management and staff, for a total annual savings of $157,100.00. SEBC asserts that these cost savings would be directed to improving WSNR's locally-originated programming, which is directed principally at the minority populations of Syracuse. SEBC notes that it currently broadcasts 16 hours per week of Italian language programming, all of which is received from either an international or a national feed. The extra resources made available by a combined operation with WOLF(AM), SEBC argues, would enable WSNR-TV to produce locally and present a half-hour to one-hour per week of Italian language programming, featuring local news and interviews and discussions with individuals in the community. In addition, SEBC asserts that WSNR-TV will use the resources available from its proposed joint operation to develop and broadcast programs for the Greek-, Polish-and Vietnamese-speaking communities of Syracuse, and the station will also be able to use the WOLF(AM) staff to produce a weekly program of news, features, entertainment, and events directed toward the Black community of Syracuse. Further, SEBC states that joint proposed operation will enable WOLF(AM) to supplement its current two-hour per week Spanish-language program with another one- to two-hour per week program highlighting news and events in the Latino community. Finally, SEBC asserts that WOLF(AM) intends to add a locally-produced hourly program directed at Syracuse's Carribean community to the two-hour program it presently produces. SEBC maintains, therefore, that the joint operation of WOLF(AM) and WSNR-TV will result in new program initiatives targeting the minority communities of Syracuse and that this new programming will benefit the entire Syracuse market.

4. Second, regarding the technical facilities involved, SEBC states that WSNR-TV is a UHF station operating with minimal power permitted for a full-service station, and WOLF(AM) is a Class IV (now Class C) AM station oriented to the needs of the Black community of Syracuse. Thus, SEBC contends, these stations are at the bottom end of the competitive spectrum, and a grant of the waiver would not affect competition in the market in any adverse way. In fact, SEBC asserts, a grant of the present waiver request would improve two marginal stations by making them better able to compete in their market. SEBC contends that the waiver would permit WSNR-TV to be a true "voice" in its market.

5. With respect to the third criterion--the number of other media outlets the applicant already owns in the market--SEBC states that its principals own no other media interests in the Syracuse market, other than Mr. Fox, as noted above, who controls WOLF(AM) in Syracuse.

6. As to the fourth standard, SEBC states that both WSNR-TV and WOLF(AM) are marginal operations. Specifically, SEBC has submitted a declaration of James L. Oyster, President of the general partner of SEBC Ltd., stating that WSNR-TV has operated at a loss since commencing operations in 1990, ranging from $500.00 to $2000.00 each year, on a very limited budget. Further, SEBC has supplied a letter from Blackburn & Co., Inc., a media broker, stating that there are no prospective buyers for WSNR-TV and indeed no market for this kind of station. Blackburn points out that the Syracuse market is already served by three VHF stations with network affiliations and by a UHF Fox affiliate authorized to operate at full power from a tall tower. Blackburn concludes that in the Syracuse and other similar markets, it is unlikely that there are enough television revenues to support another stand-alone television station.

7. Turning to the final criterion, SEBC argues that Syracuse is presently served by an unusual number of media voices for its size and that the present transaction will not adversely affect diversity. In addition to the four television stations referred to above, Syracuse also receives station WKTV(TV) (Channel 2, NBC) and WUTR(TV) (Channel 20, ABC), both Utica stations. Further, fifteen radio stations in addition to WOLF(AM) are licensed to Syracuse, and the contours of five more overlap the city. There are four noncommercial radio stations available to listeners in Syracuse. According to SEBC, there is a total of 40 broadcast outlets and 32 separate "voices" in the Syracuse area. Finally, SEBC notes that cable penetration within the primary service area of WSNR-TV is approximately 69%, with three cable suppliers providing a total of 120 channels. SEBC also notes that VCR penetration in Syracuse is 85%, making it one of the most highly ranked markets in the nation for VCR use. SEBC contends that the Commission has granted waivers in cases with similar degrees of diversity and argues that grant of the present waiver request would have no serious impact on diversity of voices in the Syracuse market, and absent a waiver, WSNR-TV might in fact be lost as one of the available broadcast outlets because of its financial difficulties.

8. Utilizing the case-by-case criteria fashioned in the *Second Report* and discussed above, we have carefully reviewed SEBC's request for a waiver and the detailed showings it has submitted in support of that request. Based on these factors, we conclude that SEBC has fully justified a permanent waiver of the one-to-a-market rule to permit common ownership of the AM-TV combination it proposes. First, as we noted above, SEBC has documented the substantial economic efficiencies which would be derived from an ongoing joint operation of these AM and TV stations in Syracuse. SEBC has, moreover, related the cost savings it would realize from these efficiencies to increased programming responsive to community needs on both the AM and TV stations. This is among the type of public interest benefits from common station ownership which we envisioned as warranting a waiver of the one-to-a-market rule. *See, e.g., Second Report*, at 1746-50; *Amendment of Section 73.3555--First Report and Order* in MM Docket No. 87-7, 4 FCC Rcd 1723, 172 7-28 (1989).[1]

9. Further, the proposed combination will not create any undue concentration of ownership or control of the broadcast media in the Syracuse market. SEBC and its principals own no other media interests in the Syracuse market, and the stations involved in the present transaction have modest technical facilities. In evaluating types of facilities under common ownership and operation, we are concerned with the potential impact on diversity of too powerful a combination. Compare *Kargo Broadcasting, Inc.*, 5 FCC Rcd 3442 (1990). As the level of diversity and competition in a market increases, however, our concern with this aspect of a proposed combination decreases. Moreover, as we noted in the *Second Report and Order*, "allowing joint operation of a low ranking radio and television station may enable the new combination to compete effectively..., thereby creating incentives for both outlets to improve their programming and service to the public." 4 FCC Rcd at 1760 n.102. Such appears to be the case here.

10. Finally, we believe that SEBC has demonstrated levels of diversity and competition in Syracuse which allay substantially the concern we might have over the common ownership of the facilities it proposes to control. Specifically, SEBC has shown an abundance of alternative media information sources in each market. In sum, we believe that SEBC has shown that a waiver of our one-to-a-market rule is in the public interest. *See generally Great American Television and Radio, Co., Inc.*, 4 FCC Rcd 6347 (1989).

11. Accordingly, the request for a permanent waiver of the one-to-a-market rule, Section 73.3555(c) of our Rules, IS HEREBY GRANTED, and having found the applicants fully qualified, the application for an assignment of the license of station WSNR-TV IS HEREBY GRANTED.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

[1] The Commission is currently conducting a rulemaking to ascertain whether, and then to what extent, its current television multiple ownership rules should be modified. *Notice of Proposed Rulemaking in MM Docket No. 91-221*, 7 FCC Rcd 4111 (1992).

July 19, 1994

CONCURRING STATEMENT
OF
COMMISSIONER ANDREW C. BARRETT

RE: In re Application of Salt of the Earth Broadcasting, Ltd. and Salt of the Earth Broadcasting Corp. for Consent to Assign the License for Station WSNR-TV, Channel 43, Syracuse, New York (BALCT-930416KF)

This Memorandum Opinion and Order grants an assignment of license and request for waiver of the Commission's television one-to-a-market rule to Salt of the Earth Broadcasting Corp. for WSNR-TV in Syracuse, New York.

I am again compelled to raise my concern that the Commission, is using the waiver process, to modify its multiple ownership rules. Therefore, while I concur in today's decision, I reiterate my belief that the pending rulemaking proceeding is the more appropriate forum for modification of the Commission's multiple ownership rules.

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: July 26, 1994

Bell Atlantic Petitions for Clarification of ICB Service Offerings -- CC Docket No. 93-162

Pleading Cycle Established

Comments: August 29, 1994
Reply Comments: September 13, 1994

On June 30, 1994, Bell Atlantic petitioned the Common Carrier Bureau (Bureau) to clarify that it has no intention of changing long-standing Commission policy regarding individual case basis (ICB) service offerings despite the language in a recent Order.[1] Bell Atlantic asserts that the language in that Order erroneously states that ICB arrangement are common carrier offerings and that, "[o]nce sufficient knowledge is gained about the costs of the service, the Commission requires that the ICB rates be converted to averaged rates applicable to all customers." Bell Atlantic states that the Bureau also asserts that ICB rates are "generally available" if tariffs with those rates are filed.

Bell Atlantic maintains that the Bureau may not, consistent with the Administrative Procedure Act, reverse a clear Commission policy. It further argues that the Bureau should vacate the above-referenced language and clarify that its Order should not be interpreted to affect existing Commission policy regarding ICBs.

Interested parties may file comments on Bell Atlantic's petition for clarification no later than **August 29, 1994**. Replies should be filed by **September 13, 1994**.

An original and four copies of all comments and replies must be filed in accordance with Section 1.51(c) of the Commission's Rules, 47, CFR § 1.51(c). In addition, one copy of each pleading must be filed with International Transcription Services (ITS), the Commission's duplicating contractor, at its office at 2100 M Street, N.W., Suite 140, Washington, D.C. 20037 and one copy with the Chief, Tariff Division, Room 518, 1919 M Street, N.W., Washington D.C. 20554.

For further information, contact Amy Glatter or Wanda Harris, Tariff Division, Common Carrier Bureau, (202) 418-1530.

FEDERAL COMMUNICATIONS COMMISSION

[1] Supplemental Designation Order and Order to Show Cause, CC Docket No. 93-162, 9 FCC Rcd 2742 (Com. Car. Bur. 1994).

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: July 26, 1994

COMSAT Corporation Files Petition for Partial Relief from Current Regulatory Treatment of Comsat World System's Services - RM 7913

Pleading Cycle Established

COMMENTS: August 25, 1994
REPLY COMMENTS: September 9, 1994

On July 1, 1994, the COMSAT Corporation (COMSAT) filed a petition for partial relief from the current regulatory treatment of COMSAT World Systems' switched voice, private line, and video and audio services. Comsat states that the petition supplements information before the Commission concerning competition in the facilities-based international telecommunications market. The petition seeks immediate regulatory relief to allow COMSAT to file its tariffs on fourteen days' notice, with a presumption of lawfulness, and minimal cost support.

COMSAT suggests that the conditions in the international telecommunications marketplace have changed radically since the Commission last analyzed them almost a decade ago. COMSAT further suggests that the competitive status of the international telecommunications market supports granting such streamline tariff relief.

Interested parties may file comments on COMSATs' petition for partial relief no later than **August 25, 1994**. Replies should be filed by **September 9, 1994**.

An original and four copies of all comments and replies must be filed in accordance with Section 1.51(c) of the Commission's Rules, 47 C.F.R § 1.51(c). In addition, one copy of each pleading must be filed with International Transcription Services (ITS), the Commission's duplicating contractor, at its office at 2100 M Street, N.W., Washington, D.C. 20554.

For further information, contact Wanda M. Harris, Tariff Division, Common Carrier Bureau, (202) 418-1530.

FEDERAL COMMUNICATIONS COMMISSION

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 94-88

In re Applications of

COMMUNITY EDUCATIONAL ASSOCIATION (hereafter "CEA") Holly Hill, Florida — File No. BPED-930316MF

CORNERSTONE COMMUNITY RADIO, INC. (hereafter "CCRI") Flagler Beach, Florida — File No. BPED-930618MG

For a Construction Permit for a New Noncommercial Educational FM Station on Channel 212A (90.3 MHz)

HEARING DESIGNATION ORDER

Adopted: July 15, 1994; Released: August 2, 1994

By the Chief, Audio Services Division:

1. The Commission has under consideration the above-captioned mutually exclusive applications for a construction permit to establish a new noncommercial educational FM ("NCE-FM") station.

2. *CEA.* Section 73.503(a) of the Commission's Rules mandates that an NCE-FM broadcast station will be licensed only to a nonprofit educational organization upon a showing that the station will be used in the advancement of an educational program. CEA states that it was organized "for educational, charitable, literary and scientific purposes." We find that this explanation is insufficient to enable the Bureau to make a positive determination that CEA is a qualified educational organization proposing an acceptable educational format in compliance with Section 73.503. Accordingly, an appropriate issue will be specified.

3. CEA proposes to place its transmitting antenna on a new 59-meter (195 feet) tower 6 miles East of the intersection of Routes 40 and 11 in Volusia County. In its study (No. 93-ASO-0351-0E), the Federal Aviation Administration notified CEA that any tower greater than 121 feet "would impact the only approach to the Ormond Beach Airport and would be considered a hazard to air navigation." An air hazard issue must therefore be specified below.

4. *Share-Time Arrangement.* The applicants have not indicated whether an attempt has been made to negotiate a share-time arrangement. Therefore, an issue will be specified to determine whether a share-time arrangement between the applicants would be the most effective use of the frequency and thus better serve the public interest. *Granfalloon Denver Educational Broadcasting, Inc.*, 43 Fed. Reg. 49560 (1978). In the event that this issue is resolved in the affirmative, an issue will also be specified to determine the nature of such an arrangement. It should be noted that our action specifying a share-time issue is not intended to preclude the applicants, either before the commencement of the hearing or at any time during the course of the hearing, from participating in negotiations with a view toward establishing a share-time agreement among themselves.

5. *Section 307(b) and Contingent Comparative Issues.* Although the respective proposals are for different communities, they serve substantial areas in common. Consequently, in addition to determining pursuant to 47 U.S.C. § 307(b) which of the proposals would better provide a fair, efficient and equitable distribution of radio service, a contingent comparative issue will also be specified.

6. *Conclusion.* Except as may be indicated by any issues specified below, the applicants are qualified to construct and operate as proposed. However, since the proposals are mutually exclusive, they must be designated for hearing in a consolidated proceeding on the issues specified below.

7. Accordingly, IT IS ORDERED, That, pursuant to Section 309(e) of the Communications Act of 1934, as amended, the applications ARE DESIGNATED FOR HEARING IN A CONSOLIDATED PROCEEDING, at a time and place to be specified in a subsequent Order, upon the following issues:

1. To determine whether CEA is a qualified educational organization proposing an acceptable educational format in compliance with 47 C.F.R. § 73.503(a) of the Commission's Rules.

2. To determine whether there is a reasonable possibility that the tower height and location proposed by CEA in this proceeding would constitute a hazard to air navigation.

3. To determine: (a) the number of other reserved channel noncommercial educational FM services available in the proposed service area of each applicant, and the area and population served thereby; (b) whether a share-time arrangement between the applicants would result in the most effective use of the channel, and thus better serve the public interest and, if so, the terms and conditions thereof; and (c) in light of 47 U.S.C. § 307(b), which of the proposals would better provide a fair, efficient and equitable distribution of radio service.

4. To determine, in the event it is concluded that a choice between the applications should not be based solely on considerations relating to 47 U.S.C. § 307(b), the extent to which each of the proposed operations will be integrated into the overall cultural and educational objectives of the respective applicants; and whether other factors in the record demonstrate that one applicant will provide a superior FM educational broadcast service.

5. To determine, in light of the evidence adduced pursuant to the foregoing issues, which of the applications should be granted, if any.

8. IT IS FURTHER ORDERED, That the Federal Aviation Administration IS MADE A PARTY to this proceeding with respect to the air hazard issue only.

9. IT IS FURTHER ORDERED, That a copy of each document filed in this proceeding subsequent to the date of adoption of this Order shall be served on the counsel of record in the Hearing Branch appearing on behalf of the Chief, Mass Media Bureau. Parties may inquire as to the identity of the counsel of record by calling the Hearing Branch at (202) 632-6402. Such service shall be addressed to the named counsel of record, Hearing Branch, Enforcement Division, Mass Media Bureau, Federal Communications Commission, 2025 M Street, N.W., Suite 7212, Washington, D.C. 20554. Additionally, a copy of each amendment filed in this proceeding subsequent to the date of adoption of this Order shall be served on the Chief, Data Management Staff, Audio Services Division, Mass Media Bureau, Federal Communications Commission, Room 350, 1919 M Street, N.W., Washington D.C. 20554.

10. IT IS FURTHER ORDERED, That, to avail themselves of the opportunity to be heard, the applicants and any party respondent herein shall, pursuant to Section 1.221(c) of the Commission's Rules, in person or by attorney within 20 days of the mailing of this Order, file with the Commission, in triplicate, a written appearance stating an intention to appear on the date fixed for hearing and to present evidence on the issues specified in this Order.

11. IT IS FURTHER ORDERED, That the applicants herein shall, pursuant to Section 311(a)(2) of the Communications Act of 1934, as amended, and Section 73.3594 of the Commission's Rules, give notice of the hearing within the time and in the manner prescribed in such Rule, and shall advise the Commission of the publication of such notice as required by Section 73.3594(g) of the Rules.

FEDERAL COMMUNICATIONS COMMISSION

Linda B. Blair, Assistant Chief
Audio Services Division
Mass Media Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 94-87

In re Applications of

MUSIC MINISTRIES, INC. (hereafter ("MMI") — File No. BPED-920128MG

COMMUNITY EDUCATION AND RELIGION BROADCASTING, INC. (hereafter "CERB") — File No. BPED-920930MB

For Construction Permit for a New Noncommercial Educational FM ("NCE-FM") Station on Channel 204A in Loogootee, Indiana

HEARING DESIGNATION ORDER

Adopted: July 15,1994; Released: August 2, 1994

By the Chief, Audio Services Division:

1. The Commission has before it the above-captioned mutually exclusive applications for a new NCE-FM station.

2. *Eligibility.* Section 73.503(a) of the Commission's Rules mandates that a NCE-FM broadcast station will be licensed only to a non-profit educational organization upon a showing that the station will be used in the advancement of an educational program. In order for the Commission to determine whether an applicant is eligible for an NCE-FM license as a nonprofit, educational organization, it must first state its educational program or objective and, secondly, it must show how its programming will be used in the furtherance of that objective.

3. Section II, Question 1 of FCC Form 340 asks the applicant to check whether it is a: "(a) governmental or public educational agency, board or institution; (b) private nonprofit educational institution; or (c) other." An applicant which checks (a) or (b) is generally presumed to have an educational program or objective and must demonstrate only the second part of the test, *i.e.*, how its programming will be used to further its educational objective. An applicant which checks (c) must specifically show how it meets both parts of the test. That is, it must show that it is in fact a nonprofit, educational organization, identify its educational objective, and then show how its programming will further that objective. Although CERB has checked (b), it has also modified its answer to specify that it is a: "(b) private nonprofit educational institution/*organization/corporation*" (emphasis added). Further, in its application (at Exh. A2), CERB states that "The applicant will provide educational and religion programming. The applicant will operate the station with educational, entertainment, religious, news, weather, public affairs programming and announcements for the communities covered by the broadcast area. . . . The applicant will provide live and taped church services for the community." Also, CERB's programming narrative (Exh. B) indicates that it will provide some instructional programming through the local school system. *See also* Exh. A1 (letter from Superintendent of Schools). In addition, CERB's application contains a copy of a one-page Articles of Incorporation in which CERB's purpose is described as: "To provide educational and religion programming." Though the application thus indicates that the proposed programming will include educational matter, insufficient information is provided for us to determine whether CERB is either a nonprofit educational institution (Section II, Question 1(b)) or an otherwise qualified nonprofit educational organization proposing to advance an educational program (Section II, Question 1(c)) in compliance with 47 C.F.R. § 73.503. Accordingly, an appropriate issue will be specified.

4. *Share-time Arrangement.* Neither of the applicants has indicated that an attempt has been made to negotiate a share-time arrangement. Therefore, an issue will be specified to determine whether a share-time arrangement between the applicants would be the most effective use of the frequency and thus better serve the public interest. *Granfalloon Denver Educational Broadcasting, Inc.*, 43 Fed. Reg. 49560 (October 24, 1978). In the event that this issue is resolved in the affirmative, an issue will also be specified to determine the nature of such an arrangement. It should be noted that our action specifying a share-time issue is not intended to preclude the applicants, either before the commencement of the hearing or at any time during the course of the hearing, from participating in negotiations with a view toward establishing a share-time agreement among themselves.

5. *Late-Filed Amendment.* The applicant below has petitioned for leave to amend its application on the date shown. The accompanying amendment was filed after the last date for filing amendments as of right. Under Section 1.65 of the Commission's Rules, the amendment is accepted for filing. However, an applicant may not improve its comparative position after the time for amendments as of right has passed. Therefore, any comparative advantage resulting from the amendment will be disallowed.

APPLICANTS	AMENDMENTS FILED
CERB	3/29/93.

6. *Conclusion.* Except as may be indicated by any issues specified below, the applicants are qualified to construct and operate as proposed. Since the proposals are mutually exclusive, they must be designated for hearing in a consolidated proceeding on the issues specified below.

7. ACCORDINGLY, IT IS ORDERED, That, pursuant to Section 309(e) of the Communications Act of 1934, as amended, the applications ARE DESIGNATED FOR HEARING IN A CONSOLIDATED PROCEEDING, at a time and place to be specified in a subsequent Order, upon the following issues:

1. To determine whether CERB is either a nonprofit educational institution or an otherwise qualified nonprofit educational organization proposing to advance an educational program in compliance with 47 C.F.R. § 73.503.

2. To determine: (a) the number of other reserved channel non-commercial educational FM services available in the proposed service area of each applicant, and the area and population served thereby; (b) whether a share-time arrangement between the applicants would result in the most effective use of the channel and thus better serve the public interest and, if so, the terms and conditions thereof; and (c) in light of Section 307(b) of the Communications Act of 1934, as amended, which of the proposals would best provide a fair, efficient and equitable distribution of radio service.

3. To determine, in the event it is concluded that a choice between the applicants should not be based solely on considerations relating to Section 307(b), the extent to which each of the proposed operations will be integrated into the overall cultural and educational objectives of the respective applicants; and whether other factors in the record demonstrate that one applicant will provide a superior noncommercial educational FM broadcast service.

4. To determine, in light of the evidence adduced pursuant to the specified issues, which of the applications should be granted, if any.

8. IT IS FURTHER ORDERED, That the petition for leave to amend filed by CERB (3/29/93) IS GRANTED, and the corresponding amendment IS ACCEPTED to the extent indicated herein.

9. IT IS FURTHER ORDERED, That a copy of each document filed in this proceeding subsequent to the date of adoption of this Order shall be served on the counsel of record in the Hearing Branch appearing on behalf of the Chief, Mass Media Bureau. Parties may inquire as to the identity of the counsel of record by calling the Hearing Branch at (202) 632-6402. Such service shall be addressed to the named counsel of record, Hearing Branch, Enforcement Division, Mass Media Bureau, Federal Communications Commission, 2025 M Street, N.W., Suite 7212, Washington, D.C. 20554. Additionally, a copy of each amendment filed in this proceeding subsequent to the date of adoption of this Order shall also be served on the Chief, Data Management Staff, Audio Services Division, Mass Media Bureau, Federal Communications Commission, Room 350, 1919 M Street, N.W., Washington, D.C. 20554.

10. IT IS FURTHER ORDERED, That, to avail themselves of the opportunity to be heard, the applicants and any party respondent herein shall, pursuant to Section 1.221(c) of the Commission's Rules, in person or by attorney, within 20 days of the mailing of this Order, file with the Commission, in triplicate, a written appearance stating an intention to appear on the date fixed for hearing and to present evidence on the issues specified in this Order.

11. IT IS FURTHER ORDERED, That the applicants herein shall, pursuant to Section 311(a)(2) of the Communications Act of 1934, as amended, and Section 73.3594 of the Commission's Rules, give notice of the hearing within the time and in the manner prescribed in such Rule, and shall advise the Commission of the publication of such notice as required by Section 73.3594(g) of the Rules.

FEDERAL COMMUNICATIONS COMMISSION

Linda B. Blair, Assistant Chief
Audio Services Division
Mass Media Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

American Telephone and Telegraph Company — File No. USP-94-W-212

Petition for Waiver of the International Settlements Policy for a Change in the Accounting Rate with the Dominican Republic

ORDER AND AUTHORIZATION

Adopted: July 20, 1994; Released: August 2, 1994

By the Chief, International Facilities Division:

I. INTRODUCTION

1. American Telephone and Telegraph Company (AT&T) has filed a petition for waiver of the Commission's International Settlements Policy (ISP)[1] to permit a change in the accounting rate between the United States and its correspondent in the Dominican Republic, Compania Dominicana de Telephonos C. Por A. ("CODETEL").[2] The Common Carrier Bureau sent a letter to AT&T stating that grant of the waiver may not serve the public interest, and that it must await formal staff action before the proposed modification could be implemented.[3]

II. SUMMARY OF WAIVER REQUEST

2. In its waiver request, AT&T seeks to implement a change in the accounting rate for IMTS and replace its existing, multi-year agreement with CODETEL, which is scheduled to be in effect through at least 1999, with a growth-based, full and reduced period accounting rate structure, which would be in effect from April 1, 1994 through December 31, 1994. The current agreement, which became effective on December 15, 1993 with an accounting rate of $1.29 per minute and a surcharge of $1.00 per message for each received collect message, provides for the IMTS accounting rate per minute to fall from $1.29 to $1.23 on January 1, 1995, to $1.17 on January 1, 1996, to $1.10 on January 1, 1997, to $1.00 on January 1, 1998, and ultimately to $0.90 on January 1, 1999. The surcharge on received collect calls is also scheduled to fall, from $1.00 per message to $0.90 on January 1, 1995, and then to $0.80 per message on January 1, 1998. We grant AT&T's request but apply certain conditions to that grant for the reasons stated herein.

3. AT&T's petition for waiver seeks to implement a growth-based, peak/off-peak IMTS accounting rate with CODETEL for the period April 1, 1994 through December 31, 1994. For a traffic imbalance that is 32 million minutes or less in a yearly quarter, the proposal provides for one rate per minute ($1.30) during the full period,[4] and another lower rate per minute ($0.60) during the reduced period.[5] For the imbalance in excess of 32 million minutes in a quarter, a lower accounting rate ($0.60) applies to all such minutes. Thus, quarterly settlement payments are based on the imbalance of minutes between AT&T in the United States and CODETEL in the Dominican Republic in a quarter and the distribution of calls between the full and reduced periods. In addition, the proposal provides for a surcharge of $1.00 to be applied to each received collect message. The surcharge is payable to the non-billing administration.

III. DISCUSSION

4. In this order, we find the proposal to reduce the accounting rate from the current level of $1.29 to $1.30/0.60 per minute is an appropriate first step to bring the accounting rate for service between the United States and CODETEL in the Dominican Republic closer to the benchmark range established by the Commission and, ultimately, to the level that reflects the cost of providing service. We are concerned, however, that this agreement replaces a multi-year agreement that provides for annual reductions in the accounting rate through the year 1999 because AT&T's proposal makes no provisions for either the level or the structure of the accounting rate after 1994. We, therefore, approve the agreement subject to the condition that accounting rates between AT&T and CODETEL for the years 1995 through 1999 are no higher than the accounting rates stipulated in the agreement between AT&T and CODETEL which is being superseded by the waiver before us.

5. In its *Phase I Report and Order*, the Commission delegated authority to the Bureau "to consider, on a case-by-case basis, granting ISP waiver requests that include a lower, more economically efficient, cost-based, international accounting rate when supported by a sound analysis of the benefits that will result from the implementation of that rate."[6] The Commission stated that the Bureau should approve accounting rate changes if the changes result in a)

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[1] The ISP requires uniform settlement rates, accounting rates and division of tolls for U.S. international carriers on parallel routes. *See Implementation and Scope of Uniform Settlements Policy for Parallel International Communications Routes*, 51 Fed. Reg. 4736 (1986) (*ISP Order*); *Reconsideration*, 2 FCC Rcd 1118 (1987); *Further Reconsideration*, 3 FCC Rcd 1614 (1988). In 1991 the Commission reformed the ISP to encourage and facilitate accounting rate reductions by U.S. carriers. *See Regulation of International Accounting Rates*, 6 FCC Rcd 3552 (1991) (*Phase I Report and Order*); *Reconsideration*, 7 FCC Rcd 8049 (1992).

[2] American Telephone and Telegraph Company, Petition for Waiver, USP-94-W-212, May 12, 1994.

[3] *See* Letter from George S. Li, FCC, to Elaine R. McHale, AT&T, dated May 31, 1994.

[4] The full period is 7 A.M. to 12 A.M., local time, every day of the week.

[5] The reduced period is 12 A.M. to 7 A.M., local time, every day of the week.

[6] *Regulation of International Accounting Rates*, 6 FCC Rcd 3552 (1991) at 3554.

a more cost-based accounting rate, and b) either a commitment to lower calling prices or some other public interest benefit.[7] In this context, we must decide under the ISP whether the proposed accounting rate change is in the public interest.

6. The accounting rate for service between the United States and the Dominican Republic is particularly important to us because net settlement payments from U.S. carriers to this country traditionally rank among the United States' highest payments. In 1992, for example, net settlements to this country totalled $129.5 million and they are growing rapidly. Only three other countries received higher payments in 1992. We believe a major factor in the high and growing settlement payments is the slow rate of progress by CODETEL in agreeing to bring down the accounting rate.[8] We viewed the multi-year agreement between AT&T and CODETEL, which became effective only recently,[9] as a major positive step.

7. The new proposal appears to represent yet another step toward reducing the accounting rate for service with the Dominican Republic. It seems almost certain that the average payment per minute under the combined growth-based, full/reduced proposal will be lower than the payment would be if the current rate of $1.29 per minute remains in effect. The latest data on the traffic imbalance between the United States and the Dominican Republic[10] suggest that payments on a growing portion of service will be at the lower accounting rate of $0.60 per minute, and many calls undoubtedly take place during the off-peak hours when the accounting rate also would be $0.60 per minute.

8. The accounting rate proposed in the AT&T petition, however, is scheduled to terminate on December 31, 1994, whereas the accounting rate that is currently in effect is scheduled to decline each year thorough 1999. In contrast, the future of the growth-based, full/reduced rate after 1994 is uncertain. We believe it is reasonable to assume that AT&T expects to be able to negotiate a more favorable accounting rate arrangement with CODETEL than the agreement that is currently in effect. Otherwise it is unlikely that A&T would have agreed to cancel the current contract and replace it with one that expires at year's end. At the same time, we are aware that market conditions are evolving in the Dominican Republic and circumstances may change between now and the end of the year. If changes occur and the proposed agreement is extended, it could result in AT&T having a higher payment per minute that it would have had if the current agreement had remained in effect through 1999. The exact outcome, of course, would depend upon the portion of service that occurs during the off-peak hours as compared to peak hours, and the portion of the traffic imbalance in excess of 32 million minutes.

9. To guard against an adverse outcome, we will evaluate AT&T's future proposals with CODETEL by comparing the accounting rate that is being proposed with the lowest of the rates stipulated in the existing agreement for the period 1995 through 1999, the accounting rate proposed in the petition for waiver that is under consideration, or any future rates that are proposed. We expect that accounting rates AT&T negotiates with CODETEL between now and the end of 1999 will be no higher than the rates currently in effect, e.g. $1.23 in 1995, $1.17 in 1996, $1.10 in 1997, $1.00 in 1998, and $0.90 in 1999. Indeed we anticipate even lower accounting rates during these years. We also expect AT&T to demonstrate in petitions for waiver it may file on the accounting rate for service with CODETEL that the rate or rates being proposed are no higher that the rate in effect at the time or the rates listed immediately above, whichever is lower.

10. Accordingly, IT IS ORDERED that AT&T's petition for waiver of the ISP, File No. USP-94-W-212, to implement the accounting rate with CODETEL, effective April 1, 1994, is granted subject to the conditions stated herein.

11. This order is issued under Section 0.291 of the Commission's Rules and is effective upon release. Petitions for reconsideration under Section 1.106 or applications for review may be filed within 30 days of public notice of this order (*see* Section 1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li
Chief, International Facilities Division
Common Carrier Bureau

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[7] *Id.*

[8] We realize that significantly more telephone service is billed in the United States than in the Dominican Republic and settlements are paid on this imbalance. A variety of factors contribute to the traffic imbalance.

[9] AT&T submitted the multi-year agreement on December 20, 1993 and it was approved on January 12, 1994. *See* USP-94-W-086.

[10] Between 1991 and 1992, AT&T's traffic imbalance with the Dominican Republic increased from 127.4 million minutes to 135.1 million minutes, and the average quarterly imbalance rose from 31.9 million minutes to 33.8 million minutes. We expect that when the data for 1993 and 1994 are filed with the Commission both sets of figures will be higher than they were in 1991 and 1992.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

INFOACCESS, INC. File No. I-T-C-94-265

ORDER

Adopted: July 21, 1994; Released: August 2, 1994

By the Chief, International Facilities Division:

1. The authorization issued on June 24, 1994 by the Chief, International Facilities Division, allowing InfoAccess, Inc. to acquire and operate facilities between the United States and the Dominican Republic (DA 94-726, released July 11, 1994) has been set aside pursuant to Section 1.113 of the Commission's rules, 47 C.F.R. § 1.113. This action was taken to permit the Common Carrier Bureau's staff to conduct an inquiry into whether InfoAccess has engaged in practices that violate the Commission's rules.

2. Accordingly, IT IS ORDERED that, pursuant to Section 4(i) of the Communications Act of 1934, as amended, 47 U.S.C. § 154(i), the authority delegated in Section 0.291 of the Commission's rules, 47 C.F.R. § 0.291, and Section 1.113 of the Commission's rules, 47 C.F.R. § 1.113, the authorization referred to above IS SET ASIDE.

FEDERAL COMMUNICATIONS COMMISSION

George Li
Chief, International Facilities Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

MICRONET, INC. File No. I-T-C-94-308

Application for Authority to
provide international television
service via the TDRS-41 Satellite.

ORDER AND AUTHORIZATION

Adopted: June 29, 1994; Released: August 2, 1994

By the Chief, International Facilities Division:

1. Upon consideration of the above-captioned uncontested application, filed by MicroNet, Inc. (MicroNet), pursuant to Section 214 of the Communications Act of 1934, as amended, we find that authorization of the requested facilities and services is required by the public convenience and necessity.

2. Accordingly, IT IS ORDERED that application File No. I-T-C-94-308 IS GRANTED, and MicroNet is authorized to:

a. establish channels of communication between its Cedar Hill, Texas earth station and the TDRS-41 satellite, connecting with similar facilities between the satellite and those points of communications listed in Appendix A; and

b. use the above facilities for the provision of international television service (a total of 4 36-MHz channels) between the U.S. and the countries listed in Appendix A.

3. This authorization is not to be construed as permitting the provision of any services between earth stations located within the U.S.

4. IT IS FURTHER ORDERED that applicant shall file a copy of any operating agreement it enters into with its foreign correspondent with the Commission within 30 days of its execution, and shall otherwise comply with the filing requirements contained in Section 43.51 of the Commission's Rules, 47 C.F.R. § 43.51.5.

5. IT IS FURTHER ORDERED that the applicant shall file a tariff pursuant to Section 203 of the Communications Act, 47 U.S.C. Section 203, and Part 61 of the Commission's Rules, 47 C.F.R. Part 61, for the service authorized in this Order.

6. IT IS FURTHER ORDERED that the applicant shall file the annual reports of overseas telecommunications traffic required by Section 43.61 of the Commission's Rules, 47 C.F.R. §43.61.

7. IT IS FURTHER ORDERED that the applicant shall file a new Section 214 application should it wish to establish additional circuits via the TDRS-41 satellite.

8. This order is issued under Section 0.291 of the Commission's Rules and is effective upon adoption. Petitions for reconsideration under Section 1.106 or applications for review under Section 1.115 of the Commission's Rules may be filed within 30 days of the date of public notice of this order (*see* Section 1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li,
Chief, Internatioanl Facilities Division
Common Carrier Bureau

APPENDIX A

Austria
Bahamas
Belgium
Canada
France
Germany
Ireland
Israel
Jamaica
Luxembourg
Mexico
Netherlands
Portugal
Sweden
Switzerland
United Kingdom

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 89-459

In the Matter of

Amendment of Section 73.202(b),	RM-7009
Table of Allotments,	RM-7260
FM Broadcast Stations.	RM-7261
(Bay City, Brenham, Cameron,	RM-7263
Centerville, Edna, Ganado,	RM-7264
Giddings, Harker Heights,	
Hearne, LaGrange, Matagorda,	
New Ulm, Point Comfort,	
Rollingwood, Rosenberg, and	
Seadrift, Texas)	

MEMORANDUM OPINION AND ORDER

Adopted: July 26, 1994; Released: August 2, 1994

By the Chief, Policy and Rules Division:

1. The Commission has before it a Petition for Special Relief and Expedited Processing filed by Radio Lee County ("Radio Lee"), licensee of Station KOKE, Channel 268C2, Giddings, Texas, directed to the *Report and Order* in this proceeding, 8 FCC Rcd 1552 (1993). For the reasons discussed below, we are granting the requested relief.

2. The *Report and Order* in this proceeding substituted Channel 268C1 for Channel 268C2 at Giddings and modified the license of Station KOKE to specify operation on Channel 268C1. Fayette Broadcasting Corporation, licensee of Station KBUK, LaGrange, Texas, filed a Petition for Reconsideration and subsequently an Application for Review directed against a separate action in the *Report and Order* denying its proposal to reallot its channel from LaGrange to Rollingwood, Texas. Under Section 1.420(f) of the Commission's Rules, the Giddings upgrade was stayed pending final resolution of the Petition for Reconsideration. This Petition for Reconsideration and Application for Review are not directed against the Giddings upgrade and the reallotment would not have an impact on this upgrade. As a result, we believe that there is no longer any need to stay the effectiveness of the Channel 268C1 upgrade at Giddings. *See Thomasville, Georgia,* 5 FCC Rcd 7602 (1990).

3. Accordingly, IT IS ORDERED, That the aforementioned Petition for Special Relief and Expedited Processing filed by Radio Lee County IS GRANTED to the extent indicated above.

FEDERAL COMMUNICATIONS COMMISSION

Douglas W. Webbink
Chief, Policy and Rules Division
Mass Media Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In re Application of

NATIONWIDE WIRELESS NETWORK CORP. — File No. 22888-CD-P/L-94

For a Nationwide Authorization in the Narrowband Personal Communications Service

MEMORANDUM OPINION AND ORDER

Adopted: July 13, 1994; Released: July 13, 1994

By the Commission: Commissioner Quello concurring and issuing a statement at a later date; Commissioner Ness issuing a statement; Commissioner Chong not participating.

I. INTRODUCTION

1. On February 10, 1994, Nationwide Wireless Network Corp. (NWN Corp.)[1] filed the above-captioned application for a 50 kHz unpaired nationwide license in the narrowband Personal Communications Service (PCS). Two petitions to deny (Petitions) were filed, one by BellSouth Corporation, BellSouth Telecommunications, Inc., BellSouth Cellular Corporation, and Mobile Communications Corporation of America (the "BellSouth Companies") and one by Paging Network, Inc. (PageNet) (jointly "Petitioners").[2] For the reasons set forth below, we deny the Petitions to the extent indicated here and grant NWN Corp.'s application subject to the conditions set forth here.

2. By this action, we award the first commercial license for Personal Communications Service. We expect this service to contribute to the development of the National Information Infrastructure by providing Americans with ubiquitous access to wireless data and voice services. We further expect the introduction of commercial narrowband PCS will result in the creation of new jobs, increase productivity, and provide the basis for more effective U.S. competition in the global telecommunications market.[3]

II. BACKGROUND

3. In July 1992, the Commission tentatively granted to Mtel a pioneer's preference for having developed and demonstrated the feasibility of significant innovations that will permit the delivery of existing and new advanced paging and messaging service in a spectrum-efficient manner.[4] In June 1993, the Commission granted a final pioneer's preference to Mtel and determined that it should receive a nationwide license for a 50 kHz unpaired block. The grant was affirmed on reconsideration with the imposition of a number of conditions.[5] Specifically, the Commission directed the licensing bureau to condition any license granted to Mtel based on its pioneer's preference upon Mtel's agreement to build a system that substantially uses the design and technologies upon which that award is based:[6] and to hold the license for a minimum of three years or until the construction requirement applicable to the five-year build-out period has been satisfied, whichever occurs first.[7]

4. The Commission also directed the Common Carrier Bureau (Bureau) to issue a Public Notice inviting Mtel to submit an application.[8] In addition, the Commission directed the Bureau to consider conditioning any license granted to Mtel as a result of its pioneer's preference on Mtel's agreement to a stricter build-out requirement than

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[1] NWN Corp. is a wholly-owned subsidiary of Mobile Telecommunication Technologies Corporation (Mtel). We note that petitioners express some confusion regarding applicant's name. *See* BellSouth Companies Reply at n.41 and PageNet Reply at n.2. Mtel filed a minor amendment to the application stating that NWN Corporation had changed its name to Nationwide Wireless Network Corporation. *See* Letter from Jai P. Bhagat to James H. Bennett (March 25, 1994). Mtel later filed a minor amendment to its application stating that the Delaware corporation records state that the applicant's name is Nationwide Wireless Network Corp. rather than Nationwide Wireless Network Corporation. Mtel asserts they have elected to notify the Commission of the use of the Corp. abbreviation in order to "ensure the complete accuracy of the Commission's records." *See* Letter from Jai P. Bhagat to James H. Bennett (April 26, 1994). We refer to Mtel and NWN Corp. interchangeably in this order.

[2] PageMart, Inc. also filed a Petition to Deny that was subsequently withdrawn. Withdrawal of Petition to Deny filed June 16, 1994 by PageMart, Inc.

Mtel challenges the Petitioners' legal standing under Section 309 of the Act to file petitions to deny given, among other things, the Petitioners "ineligibility to file competing applications and the different markets to be served by their proposed PCS offerings." Opposition of Mobile Telecommunication Technologies Corporation and Nationwide Wireless Network Corporation (Mtel Opposition) at n.4. Mtel has not persuaded us that Petitioners do not have standing.

[3] *See* Amendment of the Commission's Rules to Establish New Narrowband Personal Communications Services, GEN Docket No. 90-314 and ET Docket No. 92-100, Memorandum Opinion and Order, 9 FCC Rcd 1309, at para. 3 (1994) (*"Narrowband Reconsideration"), recon. pending.*

[4] Amendment of the Commission's Rules to Establish New Personal Communications Services, GEN Docket No. 90-314 and ET Docket No. 92-100, Notice of Proposed Rule Making and Tentative Decision, 7 FCC Rcd 5676, 5735-36 (1992).

[5] Amendment of the Commission's Rules to Establish New Narrowband Personal Communications Services, GEN Docket No. 90-314 and ET Docket No. 92-100, First Report and Order, 8 FCC Rcd 7162, 7172-75 (1993) (*"Narrowband Order"); recon. granted in part, Narrowband Reconsideration,* 9 FCC Rcd at 1315-17 (1994); *further recon. pending; appeal pending sub nom. BellSouth Corp. v. FCC,* No. 93-1518 (D.C. Cir. filed Aug. 20, 1993).

[6] This condition applies only for the nationwide channel for which the preference has been granted and only until Mtel has satisfied the initial five-year build-out requirement in the rules. *Narrowband Reconsideration,* 9 FCC Rcd at 1316, para. 47.

[7] *Id.* at para. 48.

[8] *Id.,* 9 FCC Rcd at 1316 n.26.

the requirement generally applicable in the ten-year build-out period for licensees in the narrowband PCS service.[9] In February 1994, the Bureau issued the Public Notice and, as directed by the Commission, stated that it would consider the possibility of imposing a stricter build-out requirement on Mtel, such as requiring the construction of base stations that serve 90 percent of the United States population within 10 years after the grant of the license.[10] On February 10, 1994, Mtel submitted its application, which was placed on Public Notice on February 25, 1994.[11] The two petitions to Deny were filed on March 28, 1994. Mtel's Opposition was filed on April 7, 1994, and replies to its Opposition were filed on April 19, 1994.[12]

III. DISCUSSION

A. Petitions to Deny, Opposition, and Replies

5. Petitioners advance a number of arguments to support their contention that we should not grant Mtel's application.[13] Petitioners argue that we should deny the application because Mtel does not intend to offer service using the specific technology for which it was awarded a pioneer's preference.[14] Petitioners request that we investigate Microsoft Corporation's investment in Mtel[15] to determine whether a *de jure* or *de facto* transfer of control of NWN Corp. to Microsoft would take place if these transactions are consummated.[16] In addition, the BellSouth Companies and PageNet contend that the application cannot be granted because application requirements, filing rules, and procedures for narrowband PCS have not been adopted by the Commission and, because such requirements, rules, and licensing procedures are not in place, we cannot make the necessary public interest finding under Section 309 of the Communications Act of 1934, as amended, (the "Act").[17]

6. The BellSouth Companies also argue that we cannot grant the application without first determining the existence, identity and corporate status of the applicant.[18] In support of their claims, the BellSouth Companies provide a number of documents from the State of Delaware which they assert show that the applicant appears to be nonexistent.[19]

7. PageNet contends that Mtel should be required to pay for its license.[20] Specifically, PageNet argues that the stated purpose of the pioneer's preference rules was to "assure the party granted a preference that it would receive a license to implement its innovative technology."[21] PageNet contends that the failure to require Mtel to pay for its license would create an enormous "cost structure disparity" between Mtel and other parties who may, through our narrowband PCS competitive bidding procedures, pay millions of dollars for each of the remaining ten nationwide narrowband PCS licenses. PageNet argues that giving Mtel a free license would undermine competitive conditions in narrowband PCS "without promoting any of the purposes

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[9] *Id.*

[10] Commission Invites Filing of Narrowband Personal Communications Service Pioneer's Preference Application, Public Notice, No. 41645 (released Feb. 3, 1994) (*"February 3 Public Notice"*).

[11] Common Carrier Public Mobile Services Information, Public Notice, No. 41903 (released February 25, 1994). File No. 22888-CD-P/L-94 was assigned to the application. A subsequent Public Notice was issued reminding interested parties that the Commission will consider the imposition of stricter build-out requirements on Mtel than applicable to other narrowband PCS licensees and inviting interested parties to address this issue in petitions to deny. Common Carrier Public Mobile Service Information Supplemental Notice Inviting Comments, Public Notice, No. 42032 (released Mar. 7, 1994).

[12] In addition to the amendment to its application noted above, *supra* note 1, on April 26, 1994, Mtel also filed a letter in response to a claim made by the BellSouth Companies in their Reply regarding the applicant's identity, existence, and corporate status. Mtel contends that we should accept its letter response because the BellSouth Companies improperly raised this claim for the first time in their Reply to Mtel's Opposition. Letter from R. Michael Senkowski to William Caton, Acting Secretary (April 26, 1994) ("Mtel Response"). To the extent the Mtel Response addresses the issue raised for the first time in BellSouth Reply, we will accept the Mtel Response for filing in order to assure that we have a complete record in this proceeding. The BellSouth Companies filed a Reply to the Mtel Response on May 6, 1994 ("Reply to Response"). We accept BellSouth's Reply to Response for filing.

[13] The arguments made by the Petitioners are, for the most part, identical in their essentials. To the extent that individual Petitioners make unique or separate arguments, we address them accordingly.

[14] BellSouth Companies Petition at 6-16 and Reply at 4-11; PageNet Petition at 2-6 and Reply at 2-6.

[15] On March 23, 1994 Mtel entered into agreements contemplating investments in NWN Corp. by Microsoft, William Gates, Paul Allen, Integral Capital Partners (Integral), and Kleiner Perkins Caufield & Byers (KPCB). Concurrent with the consummation of the transactions, NWN Corp.'s Board of Directors would be expanded to six members with Mtel having the right to appoint four directors and Microsoft and KPCB each having the right to appoint one director. Mtel would designate the officers of NWN Corp. The appointment of the President, Chief Operating Officer, and Chief Financial Officer of NWN Corp. would require the approval of either the Director appointed by KPCB or the Director appointed by Microsoft, which could not unreasonably be withheld. The proposed agreement provides for certain minority shareholder protections and the approval of five of the six Directors (supermajority approval) for the following extraordinary measures: (i) issuance of equity securities; (ii) sale, recapitalization, or liquidation; (iii) redemption of voting securities; (iv) asset acquisitions or investments in excess of $5 million or 5 percent of the company's assets, whichever is greater; (v) creation of any wholly-owned subsidiaries; (vi) approval of the annual budget and strategic plan; (vii) amendment of the charter documents to change voting provisions for stockholder action; and (viii) grant of stock options. The equity and voting rights in NWN Corp. after consummation would be: Mtel - 80.57 percent; Microsoft - 8.52 percent; KPCB - 4.66 percent; William Gates - 2.84 percent; Paul Allen - 2.84 percent; and Integral - 0.57 percent. Opposition at 5-7.

[16] BellSouth Companies Petition at 3-6; PageNet Reply at 8-10.

[17] BellSouth Companies Petition at 16-22; PageNet Petition at 6-18 and Reply at 12-13. PageNet also argues that we cannot grant the application because Mtel has failed to comply with Section 310(b) of the Act, which limits alien ownership interests in Commission licensees. PageNet points out that applicants routinely conduct surveys of their stockholders to acquire the information necessary for them to know with reasonable certainty that they are in compliance with alien ownership restrictions. PageNet Petition at 16-18 and Reply at 6-8.

[18] BellSouth Companies Reply at 11-16.

[19] *Id.* at 12-14 and Exhibits B, C, D, and E.

[20] PageNet Petition at 18-24.

[21] *Id.* at 18.

underlying the award of the preference to Mtel"[22] while providing Mtel with a tremendous cost advantage over similarly situated competitors. According to PageNet, Mtel's subscriber costs should be lower because it does not have to pay for the license and it will receive an even greater competitive advantage because it does not have to obtain debt financing to pay for the license. PageNet further contends, that by allowing a preference that is equivalent to a free license in an auction environment, "the Commission is directly influencing the cost structure, the debt and equity structure, and the competitive outcome of PCS."[23] PageNet argues that the Commission is creating barriers to entry by giving Mtel the equivalent of millions of dollars. PageNet further contends that the competitive advantage of a preference to Mtel also will affect traditional nationwide paging because Mtel could price its narrowband PCS service well above costs and still remain competitive with those whose costs include licensecosts in addition to construction and operating costs.[24]

8. PageNet also argues that Section 309(a) of the Act requires the Commission to consider the competitive ramifications of granting a pioneer's preference in an auction environment in order to determine whether the grant of Mtel's application is in the public interest. PageNet asserts that there are no public interest benefits that would outweigh the competitive harm created by a free grant to Mtel. PageNet contends that, because the Commission has authority to conduct auctions and every applicant has the certainty that it may acquire licenses through those auctions, the purpose of creating pioneer's preferences has been fulfilled, that is, the Commission has reduced the delays and risks inherent in its allocation and licensing procedures.[25] PageNet also argues that the grant of a free license to Mtel would skew the auction process by inflating the value of the remaining licenses to Mtel and deflating their value to others. Specifically, PageNet asserts that, to the extent Mtel could achieve economies of scale and scope by operating several 50 kHz channels, it could achieve, through cost averaging, a much higher level of profitability than others. PageNet contends that Mtel could use the money it saves from the free license to overbid for additional licenses.[26]

9. PageNet further argues that we should not grant a license to Mtel because a proposed repeal of the pioneer's preference regime is currently pending with the Commission, the grant of a pioneer's preference to Mtel was illegal, the entire pioneer's preference regime is unlawful, and the grant would give Mtel an unfair and anticompetitive headstart in providing narrowband PCS services.[27] In addition, PageNet contends that award of a license to Mtel would violate the doctrine of *Ashbacker v. FCC*[28] because the Commission's public notice invited only Mtel to submit an application.[29] PageNet alleges that it would have filed a competing application if permitted by the Commission's notice.[30]

10. Finally, the BellSouth Companies argue that a number of conditions, in addition to those already imposed by the Commission, should be placed on Mtel's grant. Specifically, the BellSouth Companies argue that we should further condition Mtel's license on its compliance with the following requirements: (i) service should be provided to every one of the Basic Trading Area (BTA) service areas; (ii) after 10 years, 90 percent of the population of every BTA service area should be covered, with 45 percent of the population of every BTA service area covered at the 5-year mark; and (iii) transfer of the license should be forbidden unless Mtel provides service to 90 percent of the population of every BTA service area.[31]

11. In its Opposition, Mtel counters that its application specifically acknowledges and accepts the three conditions that the Commission has adopted or proposes to adopt[32] that would require Mtel to: (i) build a system that substantially uses the designs and technology on which the preference award was based;[33] (ii) hold the license for three years or until the construction requirements applicable to the five-year build-out period have been met (whichever occurs first); and (iii) satisfy stricter build-out requirements than those for other 900 MHz narrowband PCS licensees. Mtel argues that the exhibits to its application demonstrate that it is legally, technically, and financially qualified to receive a narrowband PCS authorization.[34] Mtel further contends that the more stringent build-out requirements argued for by the BellSouth Companies "are disproportion-

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[22] *Id.* at 19.
[23] *Id.* at 20.
[24] *Id.* at 21.
[25] *Id.* at 22-23.
[26] *Id.* at 23.
[27] *Id.* at 25-31.
[28] 326 U.S. 327 (1945). The Court held that under the Communications Act all *bona fide*, competing applications are entitled to comparative consideration.
[29] PageNet argues that granting a pioneer's preference to Mtel unlawfully grants it a license without subjecting it to a comparative hearing.
[30] PageNet Petition at 36-39.
[31] BellSouth Companies Petition at 22-24 and Reply at 17-19.
[32] The *Narrowband Reconsideration* order mandates that any license granted to Mtel based on its pioneer's preference award *must* include conditions requiring Mtel: to build a system that substantially uses the design and technologies upon which that award is based; and to retain the license for a minimum of three years or until the construction requirement applicable to the five-year build-out period has been satisfied, whichever occurs first. 9 FCC Rcd at 1316, paras. 47-48. In addition, the Commission concluded that consideration should be given to requiring Mtel, as a further condition on its receipt of a license based on its pioneer's preference, to comply with a build-out requirement stricter than the requirement applicable to the ten-year build-out period. 9 FCC Rcd at 1316 n.26.
[33] Mtel states that

> [i]n light of the unambiguous statements in Mtel's application regarding the NWN system, there is simply no factual or legal basis for petitioners' assertions that Mtel will not deploy the innovations for which it was granted a preference.

Mtel Opposition at 4.
[34] For example, in its Financial Qualifications exhibit, NWN Corp. provides (i) an estimate of the construction costs for a 300 MSA/500 base station transmitter "Nationwide Wireless Network" (NWN) system and an estimate of the costs to operate the system for a period of one year; (ii) audited financial statements for Mtel dated March 1, 1993, including a balance sheet, as submitted to the Securities and Exchange Commission, for the year ending December 31, 1992; and (iii) unaudited balance sheets for Mtel dated September 30, 1992, including, as a supplement, a description of the financial resources available to finance construction and operating costs for a period of one year of a 300 MSA/500 base station transmitter NWN system. On February 22, 1994, Mtel amended the application to provide a

ate with anything the Commission should rationally expect from any single terrestrial-based service provider."[35] With regard to investment of Microsoft and others in NWN Corp., Mtel states that it will retain *de jure* and *de facto* control of NWN Corp. even after the consummation of the transactions and no minority investor will exercise control.[36] With regard to questions raised by PageNet regarding Section 310(b) alien ownership restrictions, Mtel states that it has "received the results of a third-party alien ownership survey which shows compliance with all applicable alien ownership limitations."[37] In response to the BellSouth Companies' claims regarding the applicant's identity, Mtel claims that there was a minor discrepancy in NWN Corp.'s incorporation chronology due to miscommunications with Mtel's Delaware counsel. Mtel claims that it filed its narrowband PCS application on February 10, 1994, under the name NWN Corp., on the understanding that this new wholly-owned subsidiary had been incorporated, when the incorporation was not effected until February 25, 1994. Mtel argues that this discrepancy did not affect the substance of the application or the ultimate ownership and control of the applicant by the parent corporation, Mtel.[38]

12. Mtel also contends that Petitioners' arguments concerning the grant of a pioneer's preference to Mtel, the legality of the pioneer's preference policies, the payment of a fee for its license, grandfathering Mtel from any changes adopted in the pioneer's preference review proceeding, and the delay of a grant to Mtel to eliminate any possible headstart advantages have previously been considered and rejected by the Commission. Accordingly, Mtel asserts that these challenges should be summarily rejected.[39]

B. Discussion

1. Pioneer's Preference Issues

13. *Ashbacker Doctrine.* The Commission has dealt with the applicability of the Ashbacker Doctrine to pioneer's preferences at length in the pioneer's preference proceeding, where we concluded that our pioneer's preference rules are not precluded by *Ashbacker*.[40] We also have previously considered and rejected PageNet's argument that grant of a pioneer's preference to Mtel is unlawful because Mtel's proposal is not innovative or spectrally efficient.[41] PageNet's argument that we cannot grant Mtel a license because the entire pioneer's preference regime is unlawful is also without merit. The pioneer's preference rules were adopted through notice-and-comment rulemaking[42] in accordance with our rules and the applicable requirements of the Administrative Procedure Act. PageNet does not contend that the pioneer's preference rules are not lawful as a result of a deficiency in the procedures followed in promulgating the rules. Moreover, as noted above, the Commission fully addressed the substantive legality of the pioneer's preference rules. In addition, the fact that the Commission is still considering repeal or modification of the pioneer's preference rules for future proceedings is irrelevant to this application.[43] Accordingly, we will not revisit these particular issues here.

14. *Headstart.* We have also considered and rejected PageNet's arguments concerning any headstart that Mtel might receive. In the *Narrowband Reconsideration*, we found that Mtel is receiving no more than a *de facto* headstart and rejected proposals to delay processing of Mtel's application.[44] We have recognized from the outset that pioneer's preference grantees may receive a *de facto* headstart because of the nature of our licensing process.[45] We note that we have recently taken the next steps in implementing our auction authority to deploy PCS rapidly by adopting competitive bidding rules to award narrowband PCS licenses.[46] and by scheduling the auction for the remaining ten nationwide narrowband PCS licenses

more current balance sheet. The application also includes a letter from Mtel guaranteeing the availability of funds for constructing and operating the NWN system. *See* Exhibit 3, Attachment 2.5

[35] Mtel Opposition at 10.

[36] *Id.* at 5-9.

[37] *Id.* at 11.

[38] Mtel Response at 2-3. Mtel included, with its Response, a Declaration from Jai P. Bhagat, President of NWN Corp., setting forth the chronology of events, confirming that the applicant is NWN Corp., and listing the Officers, Directors and Shareholders of NWN Corp., who are identical to those listed in the application.

[39] Mtel Opposition at 12-14.

[40] Establishment of Procedures to Provide a Preference to Applicants Proposing an Allocation for New Services, GEN Docket No. 90-217, Report and Order, 6 FCC Rcd 3488, 3492 at para. 33 (1991); Memorandum Opinion and Order, 8 FCC Rcd 1659 (1993).

[41] *Narrowband Order*, 8 FCC Rcd at 7173.

[42] Establishment of Procedures to Provide a Preference to Applicants Proposing an Allocation for New Services, GEN Docket No. 90-217, Report and Order, 6 FCC Rcd 3488 (1991) (*"Pioneer's Preference Report and Order"*), *recon. granted in part*, Memorandum Opinion and Order, 7 FCC Rcd 1808 (1992), *further recon. denied*, Memorandum Opinion and Order, 8 FCC Rcd 1659 (1993).

[43] Review of the Pioneer's Preference Rules, ET Docket No. 93-266, Notice of Proposed Rule Making, 8 FCC Rcd 7692 (1993) (*"Pioneer's Preference Review NPRM"*); Review of the Pioneer's Preference Rules, ET Docket No. 93-266, First Report and Order, 9 FCC Rcd 605 (1994) (*"Pioneer's Preference Review Report and Order"*).

[44] *Narrowband Reconsideration*, 9 FCC Rcd at 1317, para. 51.

[45] *Pioneer's Preference Report and Order*, 6 FCC Rcd at 3492 (1991). We specifically declined to provide a headstart beyond any such *de facto* headstart.

[46] Implementation of Section 309(j) of the Communications Act, PP Docket No. 93-253, FCC 94-98, Third Report and Order (released May 10, 1994). *See also* FCC Adopts Competitive Bid-

for later this month.[47] PageNet's concerns over any *de facto* headstart Mtel may receive should be largely alleviated by these actions.[48]

15. *Payment for License.* Arguments that Mtel should pay for its license have been considered in both the *Pioneer's Preference Review NPRM* and the *Narrowband Reconsideration.* In the *Narrowband Reconsideration,* we held that, as a matter of equity, we would not charge Mtel for the license that it may receive pursuant to its pioneer's preference award because a final order (albeit subject to pending petitions for reconsideration) addressed the preference prior to the enactment of the Omnibus Budget Reconciliation Act of 1993[49] that gave the Commission authority for competitive bidding.[50] At the outset, we note, that since the adoption of the *Pioneer's Preference Review NPRM* in October 1993 and the *Narrowband Reconsideration* in February 1994, we have adopted four reports and orders in the Competitive Bidding proceeding setting forth general auction rules and specific auction rules for narrowband PCS, interactive video data services (IVDS), and broadband PCS.[51] This has led to a greater understanding of how the competitive bidding process will work in the context of the award of spectrum for various services and, in particular, narrowband PCS. It has also resulted in concern over the effect on the marketplace that the award of a free license to one competitor will have when other competitors must bid and pay for licenses in the same service. In particular, and in light of the arguments raised by PageNet, we are concerned that the award of a free license to Mtel would create an unfair competitive advantage for Mtel at the expense of licensees who may pay significant sums for their licenses. While we have previously decided that Mtel should not have to pay for its license for equitable reasons,[52] we are required by Section 309 of the Act to determine whether the grant of a license to Mtel would serve the public interest, convenience, and necessity.[53] Accordingly, as a petition to deny has specifically raised an issue with regard to payment by Mtel for its license, we will consider the issue as part of our Section 309 determination here.

16. In adopting the pioneer's preference procedures, the Commission was concerned with fostering the development of new services and improving existing services by reducing the delays and risks for innovators associated with the Commission's allocation and licensing processes.[54] In particular, the Commission was concerned that an innovator facing a lottery situation would have no assurances of receiving a license and therefore no ability to obtain a license as a reward for its efforts.[55] We decided that a significant reward should be given to induce innovators to present proposals for new technologies and services to the Commission in a timely manner. In crafting this "reward," we did not intend to award a competitive advantage to an innovator by giving it a license for free while its competitors had to pay, but rather decided to permit an otherwise qualified pioneer's preference recipient to apply for a license without facing competing applications.[56]

> Our objective in establishing a pioneer's preference is to reduce the risk and uncertainty innovating parties face in our existing rule making and licensing procedures, and therefore to encourage the development of new services and new technologies. The essence of this risk and uncertainty is that they may not be awarded a license and, therefore, may not be able to take their developmental work into full business operation. **The most workable action we can take to reduce this risk is effectively to guarantee an otherwise qualified innovating party that it will be able to operate in the new service by precluding competing applications.**[57]

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ding Rules to Award Narrowband PCS Licenses (PP Docket No. 93-253), News Release, Report No. DC-2590 (Apr. 20, 1994) (*"April 20 News Release"*).

[47] *See* FCC to Hold Narrowband PCS and IVDS Auctions July 24-29, 1994, News Release, Mimeo No. 43178 (released May 23, 1994); and Auction Notice and Filing Requirements for Ten Nationwide Licenses for Personal Communications Services in the 900 MHz Band, Public Notice, Report No. AUC-94-01, Auction No. 1 (released May 23, 1994) and Erratum to Report No. AUC-94-01 (released May 27, 1994).

[48] The Commission has determined that the first narrowband PCS auction would include the ten available nationwide narrowband PCS licenses. *April 20 News Release* at 2.

[49] Pub. L. No. 103-66, Title IV, § 6002, 107 Stat. 387 (enacted Aug. 10, 1993).

[50] *Narrowband Reconsideration,* 9 FCC Rcd at 1316, para. 45. *See also Pioneer's Preference Review NPRM,* 8 FCC Rcd 7692, 7694-95, para. 18 (Nothing in the review of the pioneer's preference rules (for applicability of competitive bidding) will affect the Mtel proceeding). The Commission also decided that it would be inequitable to apply any pioneer's preference rule changes, including competitive bidding, to pioneer's preference proceedings in which *tentative* decisions had been made. *See Pioneer's Preference Review Report and Order.*

[51] Implementation of Section 309(j) of the Communications Act, PP Docket No. 93-253, FCC 94-61, Second Report and Order, 9 FCC Rcd 2348 (1994) (*"Competitive Bidding Second Report and Order") (general auction rules);* Implementation of Section 309(j) of the Communications Act, PP Docket No. 93-253, FCC 94-98, Third Report and Order (released May, 10 1994) (*"Competitive Bidding Third Report and Order") (narrowband PCS auction rules);* Implementation of Section 309(j) of the Communications Act, PP Docket No. 93-253, FCC 94-99, Fourth Report and Order, 9 FCC Rcd 2330 (1994) (*IVDS auctions rules);* and Implementation of Section 309(j) of the Communications Act, PP Docket No. 93-253, FCC 94-178, Fifth Report and Order (adopted June 29, 1994) (*broadband PCS auction rules).*

[52] See note 4950, *supra,* and accompanying text.

[53] Section 309(a) of the Act provides that

> Subject to the provisions of this section, the Commission shall determine, in the case of each application filed with it to which section 308 applies, whether the public interest, convenience, and necessity will be served by the granting of such application, and, if the Commission, upon examination of such application and upon consideration of such other matters as the Commission may officially notice, shall find that the public interest, convenience, and necessity will be served by the granting thereof, it shall grant such application.

47 U.S.C. § 309(a).

[54] *Pioneer's Preference Report and Order,* 6 FCC Rcd at 3488, para. 1.

[55] *Pioneer's Preference Review NPRM,* 8 FCC Rcd 7692, paras. 1 and 5.

[56] *Pioneer's Preference Report and Order,* 6 FCC Rcd at 3490, para. 19.

[57] *Id.* at 3492, para. 32 [emphasis supplied].

The Commission concluded that it has the authority to award a dispositive preference.[58] The text of the Commission's decisions makes clear that the overriding objective of the pioneer's preference rules simply is to ensure the award of a license to an otherwise-qualified pioneer's preference recipient. Nowhere did the Commission suggest it wished to give the preference recipient a competitive edge over other licenses.[59] Indeed, in rejecting proposals to give preference recipients a formal headstart over other licensees, the Commission rejected such a goal.[60] We have recognized from the outset that pioneer's preference recipients may receive a *de facto* headstart because of the nature of our licensing process, but we specifically declined to provide a headstart beyond any such *de facto* headstart.[61]

17. In light of this background, the arguments of PageNet, and our further understanding of the auction process and the competitive effect of pioneer's preference recipients, particularly in narrowband PCS, receiving licenses for free, we are unable to determine that a grant of a license to Mtel without payment would serve the public interest, convenience, and necessity under Section 309 of the Act. As noted above, Mtel, if otherwise qualified, is entitled to the grant of the license under our pioneer's preference procedures. The pioneer's preference rules, however, were not intended to "reward" Mtel with an unfair competitive advantage in the provision of narrowband PCS. If Mtel were to receive a license without paying anything[62] while other narrowband PCS providers were forced to pay substantial sums for their licenses, the Commission's licensing policies might have a significant adverse impact on the competitive marketplace.

18. The Commission has issued a number of orders relating to auctions since we decided that Mtel would not have to pay for its license, and we have developed a fuller understanding of the auction process as we have resolved various issues relating to the auctions. For example, in the *Competitive Bidding Second Report and Order*, we concluded that where licenses to be auctioned are interdependent and their value is expected to be high, the simultaneous multiple round auctions would best achieve our goals for competitive bidding and award interdependent licenses to the bidders who value them the most.[63] We later expressed our belief that the value of most narrowband PCS licenses will be significantly interdependent and we decided to group narrowband PCS licenses into various simultaneous auctions by aggregating together licenses exhibiting the greatest degree of interdependence and determined to auction the ten remaining nationwide narrowband PCS licenses in one group.[64] We further stated that

> the licenses are complements as well as substitutes, and thus their values are highly interdependent. They are complements because license aggregation enables bidders to realize certain economies of scale.... These licenses are also substitutes because, to varying degrees, they can be used as alternatives in the provision of the same or similar services.[65]

We now have a clearer understanding of the interdependence of the nationwide narrowband PCS licenses and the potential anticompetitive effects that the free award of one of these licenses may have on the PCS market as well as the auction process.

19. As noted by PageNet, a pioneer's preference recipient who receives a free license would likely enter the competitive market with a significantly lower capital investment than the other licensees who bid and pay for their licenses. The difference would likely provide the pioneer's preference recipient with a substantial competitive advantage over its rivals, an advantage that we did not intend to confer when we adopted our pioneer's preference rules. In addition, the entire bidding process may be distorted by awarding a pioneer's preference recipient with a free license. Parties who might otherwise bid may be discouraged from bidding "top dollar" or from bidding at all because of their concerns over entering a new competitive market saddled with significantly greater capital costs that could place them at a competitive disadvantage. While we recognize that Mtel is (if otherwise qualified) entitled to a license grant under our pioneer's preference rules, we no longer can conclude that the equities weigh in favor of the grant of a free license to Mtel. In this regard, previously we overvalued such equities and undervalued the countervailing competitive concerns. Therefore, based upon the record before us in this proceeding and our increased understanding of the complex competitive issues in the narrowband PCS auction context, we cannot reach the conclusion that a grant to Mtel would serve the public interest, convenience, and necessity without requiring that Mtel pay for its license.[66] Accordingly, we will condition Mtel's grant on a payment requirement.

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[58] *Id.* at para. 33. Upon reconsideration, the Commission affirmed that the preference will be dispositive. 7 FCC Rcd 1808, 1809 at para. 8. On further reconsideration, the Commission discussed at length its legal authority to award a dispositive preference. *See* 8 FCC Rcd 1659 (1993).

[59] *See* discussion at para. 1919, *infra*.

[60] *Pioneer's Preference Report and Order*, 6 FCC Rcd at 3492, para. 34:

> We further have decided not to provide a headstart for the pioneering entity beyond the *de facto* headstart that may occur due to the time it may take other entities to apply for and receive a license. The commenting parties have convinced us that no additional headstart is necessary. As Southwestern Bell points out, the main effect of a headstart would be to give the pioneer a temporary service monopoly. As Southwestern Bell, Geller and Lampert, and others note, the key public interest benefit of a preference is the assurance to the pioneering entity that, if otherwise qualified, it will receive a license. For the Commission to go beyond this and guarantee the pioneer a temporary service monopoly would not appear to be justified at this time.

[footnote omitted.]

[61] *Pioneer's Preference Report and Order*, 6 FCC Rcd at 3492, para. 34.

[62] Pioneer's preference recipients must file the appropriate application along with the accompanying filing fee.

[63] 9 FCC Rcd at 2367, paras. 109-111.

[64] *Competitive Bidding Third Report and Order* at paras. 18, 25 and 27.

[65] *Id.* at para. 27.

[66] We note that Congressman Dingell recently introduced legislation that would amend Section 309(j)(6)(G) of the Communications Act, 47 U.S.C. § 309(j)(6)(G), to require that the Commission charge a pioneer's preference recipient 90% of the highest bid for a comparable license. *See* H.R. 4700, 103d Cong.,h)2d Sess. (1994) ("Pioneer Preference Reform Act of

20. Having concluded that Mtel must pay for its license, we turn to a determination of the amount that Mtel must pay. We note that we are imposing more stringent build-out requirements on Mtel than on the other nationwide narrowband PCS licensees.[67] These additional build-out requirements may place Mtel at a competitive disadvantage because it will incur additional costs in meeting these requirements. We further note that the imposition of a payment requirement now, after our prior decision not to do so, may result in additional transaction costs for Mtel in seeking additional financing for or dedicating funds to the payment. Taking into account these new costs, we conclude that it is appropriate to grant Mtel a discount on its payment for the license even though we recognize the cost and competitive effect of the more-stringent build-out requirements that we are imposing and the likely transaction costs Mtel will incur. Accordingly, we will require Mtel to pay ninety (90) percent of the lowest winning bid for a nationwide narrowband PCS license or three million dollars ($3,000,000) less than the lowest winning bid for a nationwide narrowband PCS license, whichever is less.

21. Although we can not quantify the additional build-out and transaction costs or the countervailing competitive imbalance factor, we believe that, particularly in light of the inherent uncertainty involved in projecting the value of a license, a charge at these levels reasonably balances these factors. We recognize that the $3 million alternative might result in Mtel getting the license without payment or at minimal cost, depending on the value of the license as established by the auction. In the event that this scenario occurs, however, though, it would not undermine our purposes in requiring payment. Mtel would get the license without payment or at little cost (in recognition of its additional build-out and transaction costs) only if the value of the license itself were relatively small. If this scenario occurs, we believe that the relatively low auction prices will indicate that the price paid for the license at auction is not a significant portion of the total costs a narrowband PCS operator will incur, and the license granted without payment will not be an unfair competitive advantage for the preference winner.

22. We will condition the license upon Mtel making this payment within thirty (30) days after this Memorandum Opinion and Order, as well as the order granting its pioneer's preference, become final orders, that is, the orders are no longer subject to administrative reconsideration, or judicial review, appeal, or stay.

2. Authority to Require Payment

23. Our decision in this proceeding requires us to determine whether we have authority to condition Mtel's license on its payment of a charge. The question of our authority to require payment from pioneers was raised in the rulemaking notice that began our *Review of Pioneer's Preference Rules*;[68] but we did not resolve the question in that proceeding because our decision at that time was not to require payment for narrowband or broadband PCS preference winners.[69] Now that we have decided to require payment by Mtel, we must consider our authority to do so.

24. Section 309(j) of the Communications Act,[70] the source of our authority to select licensees by auction, applies only when the Commission has accepted "mutually exclusive applications" for licenses or construction permits. Mtel, by operation of our pioneer's preference rules, is the only entity eligible to apply for the license at issue, and there can be no mutually exclusive applications for that license. Thus, we could not require Mtel to bid in an auction under Section 309(j) unless we amended our pioneer's preference rules to change the nature of the pioneer's preference award.[71]

25. Some parties at various stages of these proceedings have contended that Section 309(j) is the only source of authority for the Commission to assess a charge (other than a generally applicable fee) for a license, and that we have no choice but to grant Mtel's license without a condition requiring payment.[72] We disagree, and for the reasons that follow, we find such authority under Section 4(i),[73] in conjunction with Sections 1, 303(r), 307, 309, and 214,[74] of the Communications Act.

26. Section 4(i), which has been called the "necessary and proper clause" of the Communications Act,[75] authorizes the Commission to

> perform any and all acts, make such rules and regulations, and issue such orders, not inconsistent with this Act, as may be necessary in the execution of its functions.

We could not rely upon Section 4(i) to contravene an express prohibition or requirement of the Act, as the language of Section 4(i) itself makes clear. Thus, if any provision of the Act prohibited the Commission from imposing a charge on a pioneer's preference recipient, Section 4(i) would not be an independent basis for such authority. But no provision of the Act addresses this issue, either expressly or implicitly. Therefore, requiring Mtel to pay for its license in the circumstances of this case is "not inconsistent

1994"). We recognize that this pending bill is not law and emphasize that our judgment on these issues is based on our own analysis and experience.

[67] *See* para. 3942, *infra*.

[68] *Pioneer's Preference Review NPRM*, 8 FCC Rcd 7692, 7693, para. 10.

[69] *Id.* at 7694-5, para. 18. *Pioneer's Preference Review Report and Order*, 9 FCC Rcd at 610, para. 9.

[70] 47 U.S.C. § 309(j).

[71] *See Pioneer's Preference Review NPRM.*

[72] *See, e.g., Narrowband Reconsideration*, 9 FCC Rcd 1315-16, para. 44.

[73] 47 U.S.C. § 154(i).

[74] 47 U.S.C. §§ 151, 303(r), 307, 309, 214(c).

[75] *See New England Telephone & Telegraph Co. v. FCC*, 826 F.2d 1101, 1108 (D.C. Cir. 1987), *cert. denied*, 490 U.S. 1039 (1989) (*quoting North American Telecomm. Ass'n v. FCC*, 772 F.2d 1282, 1292 (7th Cir. 1985)). The reference is to Article I, Section 8, Clause 18 of the Constitution, which authorizes Congress to make all laws that shall be "necessary and proper" for carrying out the enumerated powers "and all other powers" vested in the federal government.

with the Act."[76] The remaining inquiry underLSection 4(i) is whether the action the Commission proposes to take "may be necessary in the execution of its functions." In application, Section 4(i) has been held to justify FCC orders that clearly were not within explicit grants of authority, where the orders reasonably could be found to be "necessary and proper" for the execution of the agency's enumerated powers.

27. In *Nader v. FCC*,[77] for example, the court held that an FCC order prescribing a rate of return for AT&T "was in the public interest, necessary for the Commission to carry out its functions in an expeditious manner, and within its section 4(i) authority."[78] This was so even though the Communications Act gave the Commission express authority, in Section 205(a),[79] to prescribe "any charge, classification, regulation, or practice of any carrier...," but did not mention any authority to prescribe a rate of return.

28. In *Lincoln Telephone & Telegraph Co. v. FCC*,[80] the court affirmed an order of the Commission requiring the telephone company, which was a "connecting carrier" within the meaning of the Act, to file tariffs with the FCC offering certain services. The order was upheld even though the only provision in the Act requiring carriers to file tariffs, Section 203(a),[81] specifically exempted connecting carriers from that requirement. The court held:

> Section 203(a)'s terms do not ... in any way suggest that the section provides the exclusive authority under which the Commission can require a tariff to be filed. Thus, while Section 203(a) did not grant the Commission the requisite authority for its action, Section 154(i) did.[82]

29. In *North American Telecomm. Ass'n v. FCC*,[83] the Seventh Circuit affirmed an order requiring the Bell holding companies to file capitalization plans for subsidiary companies organized to sell telephone equipment, even though the Act conferred no authority on the FCC over holding companies and the legislative history of the Act suggested that Congress had considered granting such authority but ultimately had denied it.[84] The court held that the Commission's authority to require the capitalization plans arose under "a separate grant of power" -- Section 4(i).[85] The only real question, the court said, was

> whether the Commission could reasonably conclude that requiring the regional [holding] companies to submit plans of capitalization ... was necessary and proper to the effectuation of [the Commission's order requiring the separation of equipment sales from the companies' telephone operations].[86]

The court answered that question in the affirmative in holding that Section 4(i) authorized this action.

30. In *New England Telephone & Telegraph Co. v. FCC*,[87] the D.C. Circuit affirmed the Commission's order requiring AT&T (along with its former operating companies) to refund rates it had collected in excess of its authorized rate of return, rejecting the telephone companies' argument that the Commission's only statutory authority to require refunds, under Section 204(a)(1),[88] did not apply to their situation. Agreeing with the telephone companies that Section 204 "does not apply to the circumstances of this case,"[89] the court held that the Commission had "properly exercised its authority under section 4(i) to remedy the violation" of its rate of return order.[90]

31. The court found that the Commission's choice of the refund remedy, "[i]n a strictly technical sense," was "absolutely necessary" to the effectuation of its rate of return prescription.[91] But it made clear that the Commission was not required to show that it had selected "the only conceivable [remedy in order to invoke its 4(i) powers."[92] It was enough that the action chosen by the agency "was appropriate and reasonable."[93]

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[76] *See North American Telecomm. Ass'n v. FCC*, 772 F.2d at 1292-93.

Assessing an auction-based charge is not contrary to the Supreme Court's decision in *National Cable Television Ass'n v. FCC*, 415 U.S. 336 (1974) (*NCTA*). In that case, as subsequently described, the Supreme Court struck down Commission fees that the Court perceived as an effort "to recover from regulated parties costs for benefits inuring to the public generally." *Skinner v. Mid-American Pipeline Co.*, 490 U.S. 212, 223-24 (1989) (*Skinner*). The Court in *NCTA* said that the only proper measure of the fee was "value to the recipient." 415 U.S. at 342-43, 344. In this instance, we do not seek to recover from Mtel (and, by extension, from other licensees who pay auction-based charges) "costs for benefits inuring to the public generally." *Skinner*, 490 U.S. at 224. Indeed, the "measure" of the charge for Mtel is precisely the one identified in *NCTA* as the only proper measure -- the value of the license to the recipient. That value is determined by the auction price -- the value that bidders are willing to pay -- discounted for Mtel's special circumstances. *See* para. 2020, *supra*. This assessment thus does not raise concerns that the Commission may have used an incorrect standard in setting the charge. 415 U.S. at 343. Moreover, because the action the Commission takes here does not put it "in search of revenue in the manner of an Appropriation Committee of the House," *NCTA*, 415 U.S. at 341, no issue of impermissible delegation of taxing authority arises. *Id.* The charge here is determined directly by the auction process, and not by any concern for raising revenues "to recover administrative costs not inuring directly to the benefit of the parties...." *Skinner*, 490 U.S. at 224.

[77] 520 F.2d 182 (D.C. Cir. 1975).

[78] *Id.* at 204.

[79] 47 U.S.C. § 205.

[80] 659 F.2d 1092 (D.C. Cir. 1981) (*Lincoln Telephone*).

[81] 47 U.S.C. § 203(a).

[82] *Lincoln Telephone*, 659 F.2d at 1108-09.

[83] 772 F.2d 1282 (7th Cir. 1985) (*North American*).

[84] *Id.* at 1291-92.

[85] *Id.* at 1292.

[86] *Id.* at 1293.

[87] 826 F.2d 1101 (D.C. Cir 1987) (*New England*).

[88] 47 U.S.C. § 204(a)(1).

[89] *New England*, 826 F.2d at 1107.

[90] *Id.* at 1109.

[91] *Id.* at 1107-08.

[92] *Id.* at 1108.

[93] *Id.*

32. The rule that emerges from these cases is that Section 4(i), although "not infinitely elastic,"[94] is a "wide ranging source of authority."[95]

> Section 4(i) empowers the Commission to deal with the unforeseen -- even if that means straying a little way beyond the apparent boundaries of the Act -- to the extent necessary to regulate effectively those matters already within the boundaries.[96]

If an action taken by the agency does not contravene another provision of the Act, it may be justified under Section 4(i) if the Commission "could reasonably conclude that [the action] was necessary and proper to the effectuation" of its functions.[97]

33. Applying this rule to the circumstances of this case, we find authority under Section 4(i) to condition Mtel's license on the payment of an appropriate charge. First, requiring payment by Mtel is "necessary" if we are properly to carry out our public interest mandate in licensing PCS providers.[98] An important aspect of the public interest is promoting competition to the extent feasible and taking appropriate regulatory steps to ensure that the competition is fair.[99] Our development of PCS and of the pioneer's preference policies appropriately has emphasized competition at every step. Granting Mtel a license free of charge, we have found in this order, would likely give Mtel asignificant competitive advantage over other licensees who would have to pay auction prices -- a result that would not serve the public interest. We conclude that we have authority under Section 4(i) to condition Mtel's license on the payment of an amount based on the auction for other licenses in this service, in the execution of our responsibility to grant a license only if a grant would serve the public interest.

34. Second, requiring a payment by Mtel is "necessary and proper" in the execution of our function under Section 309(j) to implement a rational, fair system of competitive bidding. We have found elsewhere that the values of narrowband PCS licenses will be significantly interdependent. The prices a bidder might be willing to pay -- or even the willingness to bid at all -- might be affected in various ways by the fact that one license is available free to an applicant who will be competing with the auction winners. An award to Mtel free of charge thus might distort significantly the auction of other narrowband PCS licenses and, thereby, defeat or at least undermine some or all of the purposes of having the auction.[100] In this regard, we note that the auction statute itself does not limit our authority to require pioneer's preference recipients to pay for their licenses; it is neutral on this point.[101] We find that Section 4(i) authorizes us to condition Mtel's license on payment in order to effectuate our responsibility under Section 309(j) to design and conduct a rational and fair auction for narrowband PCS licenses.

35. Under the applicable statutes, the Commission may not grant a license or other instrument of authorization unless it can find (and does find) that a grant will serve the public interest, convenience, and necessity.[102] The D.C. Circuit has held that the Commission may grant a license "only when it would be in the public interest."[103] When necessary, the Commission may attach conditions to its grants of licenses so as to ensure that the grants will serve the public interest and to enforce those conditions.[104]

36. In this case we find that granting Mtel's license without a condition requiring payment would not be in the public interest because such a grant would create a competitive imbalance in PCS markets and because granting a free license regardless of its value would alter the competitive market and distort the statutory auction process. Where requiring payment by Mtel would track the auction procedure for awarding all other narrowband PCS licenses and would address our concerns about competition, we conclude that such a condition is "necessary and proper to the effectuation" of our functions.[105]

37. Mtel contends in its opposition to the petitions to deny that the question of payment was decided in earlier orders and need not be reconsidered now.[106] Mtel asserts that the Commission has no obligation to "re-litigate" issues it already has decided. Although we might not be required as a matter of law to revisit the payment issue in the context of Mtel's application, we clearly have authority to do so as part of our obligation to consider whether a grant would serve the public interest. This is particularly so when the issue of payment has been raised and argued vigorously in a petition to deny Mtel's license application.[107] Indeed, we do not understand Mtel's argument to suggest that we lack authority to revisit the matter.

38. In any event, when we first considered the issue, Mtel had only a pioneer's preference, not a license. The pioneer's preference award, moreover, guaranteed Mtel a license only if it could show in its application that it was otherwise qualified and that grant of the license would satisfy the statutory public interest standard. Our determination in this proceeding that grant of a license to Mtel

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[94] *North American*, 772 F.2d at 1292.
[95] *New England*, 826 F.2d at 1109.
[96] *North American*, 772 F.2d at 1292. *See also U.S. v. Southwestern Cable Co.*, 392 U.S. 157, 181 (1968); *Rural Telephone Coalition v. FCC*, 838 F.2d 1307, 1315 (D.C. Cir. 1988); *FTC Communications, Inc. v. FCC*, 750 F.2d 226, 232 (2d Cir. 1984).
[97] *North American*, 772 F.2d at 1293.
[98] *See* 47 U.S.C. §§ 307(a), 309(a), 214(a) and (c). *See also* 47 U.S.C. § 151.
[99] *See National Ass'n of Regulatory Util. Comm'rs v. FCC*, 525 F.2d 630, 636 and n.25 (D.C. Cir), *cert. denied*, 425 U.S. 992 (1976). *See also McLean Trucking Co. v. U.S.*, 321 U.S. 67, 86-88 (1944).
[100] *See* PageNet Petition at 23-24.
[101] *See* 47 U.S.C. § 309(j)(6)(b); H.R. Rep. No. 111, 103d Cong., 1st Sess. 257 (1993).
[102] 47 U.S.C. §§ 307(a), 309(a), 214(a).
[103] *NAACP v. FCC*, 682 F.2d 993, 1003 (D.C. Cir. 1982).
[104] 47 U.S.C. §§ 303(r), 214(a). *See, e.g., P&R Temmer v. FCC*, 743 F.2d 918, 926-28 (D.C. Cir. 1984). *Cf. MCI Telecomm. Corp. v. FCC*, 561 F.2d 365 (D.C. Cir. 1977), *cert. denied*, 434 U.S. 1040 (1978) (Commission may impose conditions on authorizations and enforce them only if it finds the conditions to be required by the public interest).
[105] *North American*, 772 F.2d at 1293.
[106] Mtel Opposition at 13-14.
[107] *See* PageNet Petition at 18-24 (contending that grant of a license to Mtel without payment would not be in the public interest).

without requiring payment would not serve the public interest clearly is a proper exercise of our licensing responsibility.

39. We recognize that our decision here to require payment by Mtel for its nationwide narrowband PCS license may be appealed and that our decision granting Mtel a pioneer's preference has been challenged in the D.C. Circuit. We also recognize that the overall public interest would best be served by resolving this matter expeditiously. Therefore, we will not require Mtel either to accept the license as conditioned or to file a written request rejecting the grant, which would result in the Commission setting the application for hearing pursuant to Section 1.110 of the Commission's rules.[108] Instead, the Commission will waive the requirements of Section 1.110 so that Mtel can seek judicial review immediately, unless Mtel indicates that it wishes to have its application set for hearing or accepts the license as granted. We reiterate that Mtel will not have to pay for its license until judicial review is completed.

3. Processing of Mtel's Application

40. We note that we have finalized the spectrum allocation and service rules for narrowband PCS,[109] and we conclude that Mtel's proposal is consistent with those regulations. In its application, Mtel submitted a public interest showing (Exhibit 1), a real party in interest and ownership disclosure (Exhibit 2), and a financial qualifications showing (Exhibit 3) consistent with our request in the February 3, 1994 Public Notice. In short, Mtel has demonstrated that it is qualified to be a Commission licensee. Petitioners have not shown any public interest reason why grant of Mtel's application must await the adoption of additional requirements and procedures in connection with narrowband PCS auction applications.[110] In addition, interested parties have had the full opportunity to show why, in their view, the grant is not in the public interest or raises substantial and material questions of fact under Section 309(d) of the Act. Petitioners have taken advantage of this opportunity. The record before us supplies the necessary information to determine that Mtel is legally, technically, and financially qualified and that grant of its application serves the public interest.[111]

4. Requirement to Build Proposed System

41. Questions regarding the system that Mtel will build have already been resolved by the Commission in the *Narrowband Reconsideration:*

> ... we will direct the licensing bureau to condition any license granted Mtel based on its preference upon Mtel building a system that substantially uses the design and technologies upon which its preference award is based. This condition will apply only for the nationwide channel for which the preference is being granted and only until it has met the initial five year build-out requirement in the rules.[112]

Petitioners allege that Mtel will not use the specific technologies for which it was awarded a pioneer's preference. The BellSouth Companies argue that, while Mtel relied on two specific multi-carrier modulation (MCM) techniques in winning its preference, Mtel's application simply states that it will use MCM without any detailed description.[113] PageNet asserts that Mtel's application demonstrates that it will not meet the requirements to build a system that substantially uses its pioneer's preference design and technology.[114] We find that Petitioners' arguments fail to raise any substantial and material questions of fact suggesting that Mtel does not intend to comply with the substantial use requirement. Mtel has stated that it will substantially use the design and technologies upon which its preference award is based.[115] Accordingly, we will condition Mtel's license to require it to build a system that substantially uses the design and technologies on which its pioneer's pref-

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[108] 47 C.F.R. § 1.110.

[109] *See Narrowband Reconsideration*, 9 FCC Rcd 1309 (1994).

[110] In any event, these additional rules were recently adopted and do not affect Mtel. *See Competitive Bidding Third Report and Order*. Specifically, the Commission adopted competitive bidding procedure rules (47 C.F.R. §§ 24.301 - 24.309) and interim application, licensing, and processing rules (47 C.F.R. §§ 24.403 - 24.444). These rules became effective on June 23, 1994. *See* 59 Fed. Reg. 26,741 (May 24, 1994). We find that Mtel has complied with our application filing requirements for narrowband PCS adopted in the *Competitive Bidding Third Report and Order* and no amendment to its application is required by these rules.

[111] We note that PageNet asserts that the Commission, in inviting Mtel's application, has violated the Paperwork Reduction Act of 1980 (44 U.S.C. § 3501 *et seq.*) (PRA). PageNet Petition at 10; PageNet Reply at 10-11. The requirement to submit information requests for approval to the Office of Management and Budget applies only when the information is collected from ten or more persons. *See* 44 U.S.C. § 3502(4)(A). Only one person was invited to file an application and the information collection, therefore, is not within the ambit of the PRA.

[112] 9 FCC Rcd at 1316, para. 47.

[113] BellSouth Companies Petition at 8-10. The BellSouth Companies support this argument with a Declaration of Dr. Alain Brian'on who states that the lack of specificity in Mtel's application is significant because a number of MCM techniques are under development by other companies. Brian'on Declaration at 3. The gravamen of Dr. Brian'on's Declaration is his opinion that

> Mtel has not supplied sufficient information in the NWN Application of February 10 to determine whether the system it proposes will substantially use the design and technology upon which it was granted a pioneer's preference.

Id. at 1. *See also* BellSouth Companies Reply at 4-11.

[114] PageNet Petition at 2. PageNet asserts that Mtel has not specifically declared that it will use the Mary MCM technology upon which its pioneer's preference award is based. PageNet argues for the insertion of two conditions in Mtel's license requiring the use of specific technologies and revocation of the license or payment at the highest auction price bid for a 50 kHz nationwide channel should Mtel not build the specific system. In addition, PageNet argues that the Commission should require that Mtel, four months prior to operation of the system, describe the system in substantial detail; certify and state in detail how, if at all, the system differs from the design and technology on which the pioneer's preference award is based; and address whether such differences are substantial. PageNet contends that this information should be placed on Public Notice and interested parties should be given an opportunity to comment. PageNet Petition at 2-6. *See also* PageNet Reply at 2-6.

[115] *See Narrowband Reconsideration*, 9 FCC Rcd at 1316, para. 47.

erence is based. The Commission has available to it the full range of sanctions, including, for example, forfeiture, license revocation, or non-renewal, if Mtel fails to comply with this or any other condition of its license.

5. Additional Conditions on Mtel's Grant

42. We requested comment on whether to impose additional, more stringent build-out conditions on Mtel's grant. Mtel has stated that, in the interest of expediting its grant, it agrees to accept a condition requiring Mtel to cover 90 percent of the population nationwide within 10 years after grant of its license.[116] The BellSouth Companies, however, ask us to impose even more stringent build-out requirements on Mtel.[117] We find that the conditions proposed by the BellSouth Companies are unnecessarily stringent and go well beyond our public interest requirements. A build-out of this nature does not appear to be necessary to ensure that Mtel will provide broad service to the public in a large number of localities and communities throughout the nation.[118] Nor is it clear that there will be unmet demand necessitating the requirements suggested by the BellSouth Companies. Accordingly, we will condition Mtel's license on compliance with a stricter build-out requirement than that set forth in the *Narrowband Reconsideration*. Mtel must cover 90 percent of the population at the 10-year mark. We reiterate that we will readdress, if necessary, our narrowband PCS construction requirements in the future if we find that demand for narrowband PCS services is not being met in all areas.[119]

6. Mtel/Microsoft, Real Party in Interest and Ownership

43. As indicated in the *Narrowband Reconsideration*, the Commission will condition the grant of a license to Mtel on its holding the license for a minimum of three years or until the construction requirement applicable to the five-year build-out period has been satisfied, whichever occurs first,[120] a condition Mtel has accepted.

44. We have reviewed the filing that Mtel made with regard to the investment by Microsoft and others. While Mtel states that it has entered into agreements with prospective investors on March 23, 1994, those agreements have not been submitted to us because Mtel is not seeking to implement the agreements at this time. Accordingly, we decline, at this time, to reach the issue of whether the proposed investments in NWN Corp. will result in a transfer of control. We note that Mtel may file a petition for declaratory ruling requesting that the Commission find that prior approval is not required on the grounds that the transaction does not involve a transfer of control under Section 310(d) of the Act.[121] Mtel, of course, is under no obligation to seek such a declaratory ruling and may proceed at its own risk. We note that, should a transfer of control take place without prior Commission approval, Mtel could be subject to a revocation of its license under Section 312 of the Act[122] and forfeiture under Section 503(b) of the Act.[123]

45. We are satisfied that Mtel has complied with Section 310(b) of the Act concerning alien ownership restrictions. Mtel has conducted a survey and represents that it is in compliance with the alien ownership restrictions.[124] Petitioners have raised no substantial or material questions of fact with regard to the veracity of Mtel's compliance with the alien ownership restrictions.

46. Finally, contrary to the BellSouth Companies' assertions, we note that Mtel is the real party in interest here and has explained the discrepancy in the filing chronology and the name of the applicant. The allegation made by the BellSouth Companies in their Reply that two different subsidiaries of Mtel have been represented to the Commission as the applicant is unsupported by the facts. On March 25, 1994, Mtel properly amended its application to indicate the name change of the applicant from NWN Corporation to Nationwide Wireless Network Corporation and then further amended the application to specify that the corporation records abbreviate "Corporation" as "Corp." Mtel has satisfactorily explained this discrepancy. The BellSouth Companies' allegations do not raise a substantial or material question of fact regarding the identity of the applicant, the real party in interest, or Mtel's qualifications to be a licensee.

IV. CONCLUSION

47. Having reviewed the application and the pleadings filed in this matter, we conclude that, as conditioned here, grant of the subject application for the first commercial nationwide narrowband PCS license will serve the public interest, convenience, and necessity, and that none of the petitioners raises any substantial or material question as to Mtel's qualifications to be a Commission licensee.

V. ORDERING CLAUSES

48. Accordingly, IT IS ORDERED that the Petitions to Deny filed by BellSouth Corporation, BellSouth Telecommunications, Inc., BellSouth Cellular Corporation, and Mobile Communications Corporation of America IS DENIED and the Petition to Deny filed by Paging Network, Inc. IS DENIED IN PART AND GRANTED IN PART.

49. IT IS FURTHER ORDERED that the request made by Mtel that its Response filed on April 26, 1994 be accepted as part of the record of this proceeding IS GRANTED and that the Reply to Mtel "Response" filed by the BellSouth Companies on May 6, 1994 IS ACCEPTED FOR FILING.

50. IT IS FURTHER ORDERED that the application of Nationwide Wireless Network Corp. (File No. 22888-CD-P/L-94) IS GRANTED, subject to the following conditions:

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116 Mtel Application at Exhibit 1, page 7.
117 *See* discussion at para. 1010, *supra*.
118 *See Narrowband Reconsideration*, 9 FCC Rcd at 1316, n.26.
119 *Id.*, 9 FCC Rcd at 1314, para. 34.
120 *Id.*, 9 FCC Rcd at 1316, para. 48.
121 47 U.S.C. § 310(d). *See, e.g.*, McCaw Cellular Communications Inc., 4 FCC Rcd 3784 (Com. Car. Bur. 1989).
122 47 U.S.C. § 312.
123 47 U.S.C. § 503(b).
124 *See, e.g.*, Riverside Broadcasting Co., Inc., 53 RR 2d 1154 (1983) (survey accepted to show compliance with alien ownership restrictions), *recon. denied*, 56 RR 2d (1984), *reversed and remanded on other grounds, Citizens for Jazz on WRVR, Inc. v. FCC*, 775 F.2d 392 (D.C. Cir. 1985), *recon. denied*, 104 F.C.C. 2d 644 (1986).

1. This authorization requires that Nationwide Wireless Network Corp. (d/b/a NWN Corp.) shall construct a nationwide 50 kHz narrowband Personal Communications Services system that substantially uses the design and technology upon which the pioneer's preference award to Mobile Telecommunication Technologies Corporation was based. This condition expires upon meeting the five-year build-out requirement in 47 C.F.R. §24.103(a);

2. This authorization requires that Nationwide Wireless Network Corp. (d/b/a NWN Corp.) shall retain control of the license for at least three years from the initial license grant date or until the grantee has met the five-year build-out requirement of 47 C.F.R. § 24.103(a) (construction of base stations that provide coverage to a composite area of 750,000 square kilometers or serve 37.5 percent of the U.S. population), whichever occurs first;

3. Notwithstanding the requirement of 47 C.F.R. § 24.103(a), this authorization requires that Nationwide Wireless Network Corp. (d/b/a NWN Corp.) construct base stations that serve 90 percent of the U.S. population within 10 years of initial license grant date;

4. This authorization requires that Nationwide Wireless Network Corp. (d/b/a NWN Corp.) shall pay to the United States Treasury an amount equal to ninety (90) percent of the lowest winning bid for a nationwide narrowband PCS license or three million dollars ($3,000,000) less than the lowest winning bid for a nationwide narrowband PCS license, whichever is less, thirty (30) days after this Memorandum Opinion and Order and the order granting Mtel a pioneer's preference become final orders, that is, the orders are no longer subject to administrative reconsideration or judicial review, appeal, or stay.

51. IT IS FURTHER ORDERED that Section 1.110 of the Commission's rules, 47 C.F.R. § 1.110. IS WAIVED. unless Mtel requests a hearing within thirty (30) days of the release of this Memorandum Opinion and Order.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

CONCURRING STATEMENT
OF
COMMISSIONER JAMES H. QUELLO

RE: Nationwide Wireless Network Corp.
Mtel Narrowband PCS License

Because I have consistently contended that pioneer's preference grantees were never intended to take their spectrum for free in a post-auction world, it may seem curious that I am not giving my unqualified support to a Commission decision that endorses that principle. Two aspects of today's decision, however, trouble me.

The first is the prospect that, as the decision candidly admits, Mtel could in fact wind up paying nothing for its spectrum if the spectrum's auction value turns out to be $3 million or less. To me, this result is inconsistent with the basic reason for having auctions, which is to capture the value of spectrum for the public. Even at an unexpectedly low auction price, no one could plausibly argue that narrowband PCS spectrum would have no value for Mtel. For this reason, I cannot endorse a payment plan that could allow Mtel, or any pioneer's preference holder, to take its spectrum for free. I do believe, however, that the current pre-auction estimates of the value of narrowband PCS spectrum are more likely to be too low rather than too high, and therefore Mtel will ultimately make a substantial payment for its spectrum. On this basis, and this basis alone, I can concur with this aspect of the Commission's decision.

The other facet of today's decision that I find problematic is our statutory basis for imposing this payment requirement on Mtel. Our legal analysis, although plausible, certainly entails what may best be described as an aggressive interpretation of Section 4(i) of the Communications Act. Should this decision be appealed, I trust that the reviewing court will agree with our interpretation in light of the case law we cite - but it would be unrealistic to suggest that reviewing courts are lately in the habit of extending us this sort of benefit of the doubt. And if for any reason today's decision does not stand, with the result that we are unable to require payment from pioneer's preference holders, I for one would seriously question whether we should grant such preferences in the future.

SEPARATE STATEMENT
OF
COMMISSIONER SUSAN NESS

Re: *Award of Narrowband PCS License to Mtel Corporation*

Today we award a narrowband PCS license to Mtel but impose a payment obligation upon the licensee. This decision reflects a careful balancing of competing interests and a conscientious effort to meet our statutory obligation to serve the public interest, convenience, and necessity.

This is the first substantive Commission decision involving pioneer's preferences in which I have participated. Although the creation of the pioneer's preference program and the decision to award a pioneer's preference to Mtel both predated my arrival, I have thought it important for the Commission to maintain a sense of continuity. For this reason, I firmly support the issuance of a license to Mtel, one which grants it the recognition and the opportunity to participate in the narrowband PCS market that was promised.

Yet our public interest responsibilities also require that other factors be considered. Subsequent to the award of a final pioneer's preference to Mtel, Congress enacted legislation which requires that competitive bidding be used to resolve mutually exclusive license applications for services such as narrowband PCS. As a consequence of the Commission's earlier ruling, Mtel's application is not subject to mutually exclusive applications, but we cannot ignore the adverse consequences that could result from awarding one of several licenses without payment while requiring that other parties pay what could be substantial sums for their licenses.

As I reviewed the circumstances and the history of legislative and administrative actions in this area, I reached several conclusions. First, enactment of the auction legislation fundamentally altered the significance of the pioneer's preference grant and the potential relationship among competitors in the narrowband PCS market. Second, there was nothing in the legislation or its legislative history to suggest that the Congress intended to create substantial competitive disparities between successful bidders and recipients of pioneer's preferences. Third, the adverse competitive effects of awarding a single party a license without payment increase as the value of the license itself increases. Fourth, complete exemption from a payment obligation could result in a pioneer being unjustly enriched by Commission action bestowing valuable rights which may be arbitrarily disproportionate to any public benefits resulting from efforts undertaken in response to the inducement of the pioneer's preference program. Fifth, the Commission has not only the authority but also the duty to determine whether a pioneer's preference license should be awarded unconditionally or

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 93-54

In re Application of

GAF BROADCASTING COMPANY, INC. File No. BRH-910201WL

For Renewal of License of Station
WAXQ(FM) (formerly WNCN(FM)),
New York, New York

ORDER

Adopted: July 21, 1994; Released: August 3, 1994

By the Commission:

1. Before the Commission for consideration is a Joint Request for Approval of Agreement for Dismissal of Court Appeals and Pleadings Before the Commission filed March 29, 1994 by GAF Broadcasting Company, Inc. (GAF), licensee of FM broadcast station WAXQ (formerly WNCN) and Listeners' Guild, Inc. (Guild).[1]

2. The settlement agreement proposes that, upon Commission approval of the Joint Request, all of Guild's pending petitions to deny (and other requests for FCC action in connection therewith) and Guild's pending appeals before the U.S. Court of Appeals (DC Circuit) shall be deemed withdrawn and dismissed with prejudice, and, in addition, Guild promises not to file a competing application, nor intervene or otherwise provide aid to or file pleadings in support of any competing application, for the frequency occupied by WAXQ before June 1, 1998 (or prior to the expiration of WAXQ's current license term, whichever is longer). In return, GAF will pay Guild $110,000 and grant authority to Guild to use the WNCN Listener's Club mailing list for a maximum of two mailings per year for two years with a provision for possible liquidated damages not to exceed $110,000. Guild filed declarations establishing legal expenses in excess of $280,000. On April 11, 1994 and May 26, 1994, respectively, the Court of Appeals remanded Case No. 92-1270 and Consolidated Case Nos. 93-1618 and 93-1687 to the Commission for consideration of the Joint Request.

3. The Joint Request fully complies with the provisions of 47 C.F.R. § 73.3588 that govern settlement agreements. In *Intercontinental Radio, Inc.*, 62 RR 2d 1565, 1567 (1985), the Commission held that restrictive provisions of a settlement agreement concerning parties' future conduct, which were reasonably limited in duration and geographic extent, were not inconsistent with the public interest. Attached to the Joint Request is a copy of the Settlement Agreement dated March 25, 1994, and supporting declarations of pertinent persons reflecting that no consideration of any kind has been, or will be received, in excess of Guild's legitimate and prudent expenses in these proceedings. Under these circumstances, it appears that approval of the Joint Agreement will serve the public interest by terminating these proceedings and conserving the resources of the Commission and the parties.[2]

4. ACCORDINGLY, IT IS ORDERED, That the Joint Request for Approval of Agreement for Dismissal of Court Appeals and Pleadings Before the Commission filed March 29, 1994 by GAF Broadcasting Company, Inc. and Listeners' Guild, Inc. IS GRANTED; the Settlement Agreement dated March 28, 1994, IS APPROVED; Applications for Review filed October 27, 1993 and December 23, 1993 by Listeners' Guild, Inc. ARE DISMISSED; and the renewal application of GAF Broadcasting Company, Inc. (BRH-910201WL) IS GRANTED subject to the following:

> that the grant is conditioned on final Commission disposition of the staff inquiry into WAXQ(FM)'s (formerly WNCN(FM)), equal employment opportunity program and practices.

5. IT IS FURTHER ORDERED, That MM Docket No. 93-54 IS TERMINATED.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

[1] The following additional pleadings were filed: (1) a supplement to the Joint Request, filed April 6, 1994 by GAF; (2) supplemental declarations in support of Joint Request filed April 29, 1994 by Guild; and (3) comments in support of approval of Joint Request filed May 4, 1994 by the Mass Media Bureau.

[2] The dismissal of Guild's filings challenging GAF's EEO record at WNCN(FM) does *not*, however, dispose of the issues raised by Guild. As the Bureau notes, the Commission is required to independently address and determine whether any substantial and material questions of fact exist concerning GAF's qualifications and its compliance with the Commission's rules. *See, e.g., Booth American Company*, 58 FCC 2d 553, 554 (1976).

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: August 3, 1994

WINNEBAGO COOPERATIVE TELEPHONE ASSN. AND GTE MIDWEST INCORPORATED FILED A JOINT PETITION FOR WAIVER OF THE DEFINITION OF "STUDY AREA" CONTAINED IN PART 36, APPENDIX-GLOSSARY, AND SECTION 61.41(C) OF THE COMMISSION'S RULES AAD 94-95

Comment Date: August 22, 1994
Reply Date: September 6, 1994

On July 11, 1994, Winnebago Cooperative Telephone Association ("WTCA") and GTE Midwest Incorporated ("GTE") filed a joint petition for waiver of the definition of "Study Area" as set forth in Appendix-Glossary of Part 36 of the Commission's rules. This waiver would allow the parties to reflect the changes in their study area boundaries that would result from GTE's sale of one telephone exchange in Iowa to WTCA. WTCA also seeks waiver of Section 61.41(c) of the Commission's price cap rules, 47 C.F.R. § 61.41, to exempt it from the price cap "All or Nothing" rule and allow it to continue to operate as a cost company in the National Exchange Carrier Association's common line and traffic sensitive pools. The petitioners state that this transaction has been approved by the State of Iowa Utilities Board.

Interested parties may file comments on GTE and WTCA's petition on or before **August 22, 1994**, and reply comments on or before **September 6, 1994**, with the Secretary, Federal Communications Commission, 1919 M Street, N.W., Room 222, Washington, D.C. 20554. Comments and reply comments should reference AAD 94-95. Four (4) copies should also be sent to Adrian Wright, Common Carrier Bureau, Room 812, 2000 L Street, N.W., Washington, D.C. 20554, and one (1) copy should be sent to the Commission's contractor for public service record duplication: International Transcription Service (ITS), 2100 M Street, N.W., Suite 140, Washington, D.C. 20037. Copies of the petition may be obtained from the Accounting and Audits Division's public reference room, Room 812, 2000 L Street, N.W., Washington, D.C.; copies are also available from ITS at (202) 857-3800.

We will treat this proceeding as non-restricted for purposes of the Commission's *ex parte* rules. *See generally*, 47 C.F.R. §§ 1.1200-1.1216. For further information contact Adrian Wright at (202) 634-1861.

FEDERAL COMMUNICATIONS COMMISSION

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

United Broadcasting Corporation d/b/a Telemiami v. Rifkin/Narragansett South Florida CATV Limited Partnership, d/b/a Gold Coast Cablevision — CSR-4261-L

ORDER

Adopted: June 30, 1994; Released: June 30, 1994

By the Chief, Cable Services Bureau:

I. INTRODUCTION

1. In this Order, we grant an emergency petition filed by United Broadcasting Corporation, d/b/a Telemiami ("Telemiami") against Rifkin/Narragansett South Florida CATV Limited Partnership, d/b/a Gold Coast Cablevision ("Gold Coast") requesting temporary waiver of Section 76.975(h) of the Commission's rules. We grant the relief requested for 90 days.[1]

II. BACKGROUND

2. Section 612 of the Communications Act requires a cable operator to designate channel capacity for commercial use by persons unaffiliated with the operator. Section 612 also requires that the Commission determine the maximum reasonable rates that a cable operator may impose for leased commercial access.[2] The cable operator must establish the price, terms, and conditions of commercial use consistent with the rules established by the Commission.[3]

3. Section 612 also requires the Commission to establish procedures for the expedited resolution of disputes concerning rates or carriage on leased access channels.[4] In establishing its rules, the Commission provided that, during the pendency of such a dispute, a party seeking to lease channel capacity for commercial purposes shall comply with the rates, terms and conditions prescribed by the cable operator, subject to refund or other appropriate remedy.[5]

III. CONTENTIONS

4. Telemiami states that it offers advertiser-supported commercial 24-hour variety leased access programming, 90% of which is in Spanish and the rest in Portuguese, and that it has done so for ten years. Telemiami further states that it entered into a three-year channel access lease with Gold Coast on September 1, 1990, under which Telemiami would make advertising time available for sale by Gold Coast.[6] Telemiami states that on March 25, 1994, Gold Coast informed Telemiami that Gold Coast planned to discontinue carriage of Telemiami effective April 1, 1994, and further that, by letter dated March 30, 1994, Gold Coast extended that deadline to April 30, 1994. On April 1, 1994, Gold Coast proposed new leased access rates under which Telemiami's monthly payments would be $20,000. On April 18, 1994, Telemiami offered to pay Gold Coast $5,300 per month, and on April 21, 1994, Gold Coast agreed to extend its carriage of Telemiami until May 31, 1994, so that Telemiami could review Gold Coast's terms and the parties could attempt to negotiate. On May 27, 1994, Gold Coast rejected Telemiami's offer and informed Telemiami that it would discontinue carriage of Telemiami on June 1.

5. On May 31, 1994, Telemiami paid Gold Coast $20,000 for access through June 30, 1994. Under the terms offered by Gold Coast, another payment of $20,000 would be due on June 30. On June 14, Telemiami offered Gold Coast $3,500 per month until the Commission rules on the complaint, which Gold Coast refused. Telemiami asserts that although it might be able to make the June 30 payment through a personal loan obtained by one of its investors, Telemiami cannot make further payments. Telemiami argues that if the Commission does not waive Section 76.975(h), Telemiami will have to cease operations. Telemiami states that preserving Spanish-language leased access programming in the Miami area is good cause for a waiver. Telemiami requests that the Commission allow it to compensate Gold Coast with advertising spots, as provided in the prior contract, pending the resolution of the complaint. In the alternative, Telemiami requests that the Commission order that the permitted charge for leased access provided to Telemiami on Gold Coast's system shall be $3,500 per month, pending resolution of the complaint.

6. In opposition to the emergency petition, Gold Coast notes that its offer to carry Telemiami at $20,000 per month is a 23% discount from the authorized full channel rate of $26,000, calculated under the Commission's leased access rules.[7] Gold Coast states that granting the waiver will potentially exclude other leased access programmers who might provide a successful and valued service. Gold Coast explains that it is statutorily required to set aside seven channels for leased access use; that four channels, including Telemiami's, are already occupied; and, that a fifth

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[1] On May 31, 1994, Telemiami filed a petition for special relief ("complaint") against Gold Coast alleging that new leased access rates proposed by Gold Coast violate the Commission's leased access rules. The complaint is pending. On June 28, 1994, Gold Coast filed an opposition to the emergency petition for waiver.

[2] 47 U.S.C. § 532(c)(4)(A)(i); *see also* 47 C.F.R. § 76.970.

[3] 47 U.S.C. § 532(c)(1).

[4] 47 U.S.C. § 532(c)(4)(A)(iii).

[5] 47 C.F.R. § 76.975(h). *See also Report and Order*, MM Docket No. 92-266 (*"Rate Order"*), FCC 93-177, 8 FCC Rcd 5631 (1993). We note that petitions for reconsideration of the leased access provisions of the Commission's rules are pending.

[6] The contract grants to Gold Coast (a) the right to market and sell three percent of Telemiami's available advertising spots, or (b) ten percent of the ad sales of advertising sold by Telemiami within Gold Coast's area. Telemiami states that Gold Coast has never availed itself of its right to sell time on Telemiami.

[7] Gold Coast notes that it also offered to carry Telemiami at

provider has signed a leased access agreement and expects to start providing service on August 15, 1994.[8] Gold Coast argues that Telemiami has not shown that granting the waiver will promote competition and program diversity.

IV. DISCUSSION

7. We believe that the Telemiami petition should be resolved in a way that fairly balances the interests of Gold Coast and Telemiami pending resolution of the underlying complaint in light of the statutory purpose of leased commercial access. The 1992 Cable Act provides that the purpose of leased commercial access is to promote competition in the delivery of diverse sources of video programming and to assure that the widest possible diversity of information sources are made available to the public from cable systems in a manner consistent with growth and development of cable systems.[9]

8. Implementation of Gold Coast's proposed rates raises a substantial possibility of termination of Telemiami's programming service on a temporary or permanent basis, thus constituting irreparable injury to Telemiami.[10] Granting the waiver request, however, could assure continued provision of Telemiami's service pending resolution of Telemiami's leased access complaint. Further, requiring Gold Coast to continue carriage of Telemiami pending resolution of the complaint will not apparently preclude provision of leased access service to other programmers. Thus, Gold Coast is required to set aside seven channels for leased access use; four are currently occupied and a fifth user is supposed to begin providing service on August 15, 1994. Therefore, two channels are available for other leased access providers.[11] Accordingly, we conclude that permitting Telemiami to continue leased access use at a maximum permitted charge of $5,300 per month pending resolution of the complaint will most fairly balance the interests of the parties and would be most consistent with the statutory purposes of leased commercial access.[12]

9. Telemiami requests that we continue its contract in effect pending resolution of its complaint or, alternatively, that Gold Coast be permitted to charge $3,500 per month. Gold Coast has not indicated which alternative relief it would prefer. We note, however, that Telemiami has previously offered to pay $5,300 per month to Gold Coast, indicating its ability to pay that amount. Accordingly, we will permit Gold Coast to elect, within ten days of the release date of this Order, whether to charge a monthly rate of $5,300, as offered by Telemiami, or to continue the terms of its previous contract in effect under which it receives compensation in the form of advertising time.

10. We emphasize that we establish this relief as a temporary measure pending the resolution of Telemiami's underlying leased access complaint. We intend to resolve that complaint within approximately ninety days.

V. ORDERING CLAUSE

11. Accordingly, IT IS ORDERED, pursuant to 47 U.S.C. § 532, that the emergency petition of United Broadcasting Corporation, d/b/a Telemiami, for waiver of Section 76.975(h) of the Commission's rules IS GRANTED, as described above.

FEDERAL COMMUNICATIONS COMMISSION

Meredith J. Jones
Chief, Cable Services Bureau

$8,000 for carriage from midnight to noon; at $16,000 for carriage from noon to midnight; or at $13,500 for carriage from 6 a.m. to 8 p.m., and that Telemiami rejected all these options.

[8] Gold Coast explains that two of its leased access providers, Black Entertainment Television and The Learning Channel, satisfy a portion of Gold Coast's leased access obligations as qualified minority and educational programming sources. 47 U.S.C. § 532(i)(2),(3). Gold Coast has not provided evidence of its agreement with the fifth provider nor stated the rate Gold Coast intends to charge.

[9] Section 612(a) of the Communications Act of 1934, as amended; 47 U.S.C. § 532(a).

[10] Although Telemiami has not provided a complete financial showing, it has stated, supported by affidavit, that the proposed rate increases substantially exceed its total monthly revenues. This is a sufficient showing to raise a substantial question that implementation of Gold Coast's proposed rates could cause termination of Telemiami's service on a temporary or permanent basis.

[11] Gold Coast argues that forced carriage of Telemiami would violate its rights under the First and Fifth Amendments. We disagree. Requiring Gold Coast to provide access to Telemiami on a temporary basis is an exercise of our authority under Section 612 to determine maximum leased access rates. We do not believe that setting maximum reasonable rates under Section 612 violates the First Amendment. Further, Gold Coast has not shown that the maximum reasonable rate we are setting pending resolution of Telemiami's underlying leased access complaint violates the Fifth Amendment.

[12] In adopting its leased access rules, the Commission stated that its rules would need refinement both through the rule making process and on a case-by-case basis. The Commission further stated that leasing issues may need to be addressed in quite different fashions depending upon the nature of the service involved--whether the lease is for a pay channel, an advertiser supported channel intended for wide distribution, a channel for a narrow commercial purpose not relevant to the wide body of cable subscribers, or for a single program or series of programs. *Rate Order* at 5936.

Before the
Federal Communications Commission
Washington, D.C. 20554

CC Docket No. 88-245

In the Matter of

Allocation Method for Unrouted Ship-to-Overseas INMARSAT Telex Traffic — RM No. 6013

REPORT AND ORDER

Adopted: June 13, 1994; Released: July 11, 1994

By the Commission: Commissioners Ness and Chong not participating.

I. INTRODUCTION

1. The Notice of Proposed Rulemaking in CC Docket 88-245[1] provided notice of our intention to develop a new mechanism for the allocation of certain unrouted ship-to-overseas telex traffic transmitted over the space segment of the International Maritime Satellite Organization (INMARSAT).[2] In this Report and Order, we decline to adopt a Commission-imposed allocation mechanism. Instead, we conclude that we should continue our existing policy of allowing earth station operators to allocate unrouted ship-to-overseas telex traffic on any basis that is not unjust or unreasonably discriminatory.[3] We believe this approach will serve the public interest by encouraging competition in the provision of telex service.

II. BACKGROUND

2. Ship-to-overseas telex[4] traffic as considered in this Report and Order is telex traffic sent via the INMARSAT space segment from a ship to a COMSAT[5] or other coast earth station in the United States, then carried over the facilities of a U.S. carrier to a foreign destination. When we initially addressed the allocation of unrouted ship-to-overseas telex traffic in 1979, we found that there was insufficient unrouted[6] ship-to-overseas traffic to justify the administrative and operational burden of a Commission defined and imposed distribution mechanism.[7] Thus, we directed COMSAT to allocate the traffic in a nondiscriminatory manner, but noted that we would reconsider whether or not to adopt a Commission-imposed allocation mechanism for unrouted ship-to-overseas traffic if a significant amount of traffic materialized. In exercising its discretion under this policy, COMSAT adopted a rotational allocation mechanism that guarantees that a carrier with an interconnection agreement with COMSAT will share equally in the distribution of unrouted ship-to-overseas telex traffic regardless of the price and quality of the 'terminating carrier's offerings.

3. MCI Communications Corporation (MCI) filed a Petition for Rulemaking requesting that we institute a proceeding to adopt a new method for allocation of unrouted ship-to-overseas traffic. MCI proposed that we replace the rotational allocation method with a proportionate return scheme. MCI argued that, because the current rotational system does not recognize the volume of overseas-to-ship telex traffic (*i.e.*, foreign-originated traffic transiting the U.S.) that a terminating' carrier delivers, these carriers have no incentive to increase traffic levels into the INMARSAT system. This lack of incentive, MCI asserts, diminishes competition.

4. In the NPRM, we explained that it is our policy to encourage competition in the provision of telecommunications services when it will serve the public interest. We tentatively determined that the rotational method provided no incentive for terminating carriers to increase their competitive efforts. We proposed the adoption of a proportionate return allocation method whereby unrouted ship-to-overseas telex traffic would be distributed among interconnecting terminating carriers in proportion to the volume of overseas-to-ship telex traffic that each carrier

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[1] Allocation Method for Unrouted Ship-to-Overseas INMARSAT Telex Traffic, *Notice of Proposed Rulemaking* (NPRM), 3 FCC Rcd 2654 (1988).

[2] INMARSAT is an independent international organization comprised of 74 member nations. It was created in 1979 to establish an international maritime satellite system to provide maritime communications for distress and safety of life at sea, public correspondence, radiodetermination and ship management.

[3] 47 U.S.C. §202.

[4] Telex refers to a customer-to-customer switched record service using telegraph-grade connecting circuits and characterized by a two-way communications capacity.

[5] The International Maritime Satellite Telecommunications Act (Maritime Act), 47 U.S.C. §§751-757 (1988), permits COMSAT (formerly the Communications Satellite Corporation) and others to own and operate coast earth stations in the United States. Under this Act, COMSAT is responsible for providing INMARSAT space segment to its own and other earth stations. Further, the Act requires COMSAT (but not other earth station owners) to interconnect its earth stations with independent carriers, defined as United States domestic and international common carriers in which COMSAT has no ownership interest. Eight such carriers have entered into interconnection agreements with COMSAT for the purpose of providing INMARSAT telex services. These carriers are: Consortium Communications International, Inc. (CCI); FTC Communications, Inc. (FTCC); Graphnet, Inc. (Graphnet); WU World Communications, Inc.; formerly ITT World Communications, Inc. (WU WorldCom); MCI/Western Union International (WUI); RCA Global Communications, Inc. (RCA); TRT Telecommunications Corporation (TRT); and Western Union Telegraph Company (WUTC). In 1990, TRT and FTC merged to create TRT/FTC. (These carriers are herein referred to as terminating carriers.) It should be noted that terminating carriers, as well as other entities, are eligible to own and operate earth stations. Currently, only COMSAT and IDB operate U.S. licensed earth stations.

[6] Unrouted traffic refers to traffic that is not designated by the customer for handling by a particular common carrier.

[7] *International Maritime Satellite System*, 71 FCC 2d 1069 (1979).

delivers to the INMARSAT system. We tentatively concluded that allocating traffic in this manner would reward carriers' successes in the marketplace and thus provide an incentive for carriers to increase their competitive efforts. We also asked for comment on (1) whether unrouted ship-to-overseas telex traffic should be distributed in proportion to total shore-to-ship satellite telex traffic, including domestic and foreign-originated telex traffic; (2) whether there is any other unrouted ship-to-shore telex traffic which should be routed in accordance with the proportionate allocation method; and (3) how often the carriers' proportionate shares of unrouted ship-to-overseas telex traffic should be adjusted.

5. In response, we received comments from COMSAT, MCI, Graphnet, FTCC and CCI. Subsequently, in April 1992, the Common Carrier Bureau invited interested parties to update the record.[8] MCI and TRT/FTC filed supplemental comments. In its comments, COMSAT supported MCI's proposal to replace the rotational method of allocation with a proportionate allocation mechanism. COMSAT argued that the rotational method of allocation has a number of flaws and is inherently unfair because shares are allocated among terminating carriers solely based upon an arbitrary number of interconnecting carriers.[9] In contrast, arguing the interests of fairness and stability, Graphnet, FTCC and CCI favored retention of the rotational method of allocation. Graphnet, FTCC and CCI also argued that the proportionate allocation mechanism would reward the entrenched international telex carriers, benefit foreign administrations, fail to promote competition, and operate in a manner contrary to the public interest. In the event that the Commission chose not to retain the rotational method, CCI offered two alternative proposals. The first proposal by CCI suggested that COMSAT refuse to accept ship-to-overseas telex traffic until a shipboard operator selects a terminating carrier. The second suggested alternative required that ship-to-overseas telex traffic be routed on a least-cost basis.

III. DISCUSSION

6. We decline to mandate any allocation mechanism which would compel COMSAT and other U.S. earth station operators to allocate unrouted ship-to-overseas telex traffic to terminating carriers in a specific manner. Instead, we continue our existing policy of allowing earth station operators to allocate unrouted ship-to-overseas telex traffic on any basis that is not unjustly or unreasonably discriminatory. Thus, earth station operators will not be limited to the rotational method, but will have the discretion to enter into flexible routing arrangements to best serve the interests of their customers in obtaining technically satisfactory service at the least cost, provided such arrangements are not unjustly or unreasonably discriminatory. We also encourage any entity, including a terminating carrier, to build and operate its own earth station to provide INMARSAT service.

7. We reach this result based on several factors. First, this Commission seeks to encourage competition in the provision of telecommunications services wherever such competition will serve the public interest. Thus, although we proposed requiring a proportionate allocation mechanism in the NPRM, we believe that a Commission-imposed policy is unnecessary and less likely to promote competition and the welfare of consumers in this context. Instead, we believe that continuing our policy of allowing earth station operators the flexibility to allocate unrouted calls in a nondiscriminatory manner using the allocation method of their choice remains the most beneficial approach for consumers. Such an approach should provide these carrier earth station operators with incentives to route traffic through quality, low cost terminating carriers in order to offer a total package that attracts new customers and retains their existing customers.

8. In addition, we note that even though the ship-to-overseas telex market has grown in recent years,[10] it is still small in both percentage and absolute terms. In such circumstances, we do not believe that it is necessary for this Commission to devote resources to developing a traffic allocation formula. Instead, we encourage customers to select a terminating carrier based upon the customer's perception of the relative merits of the terminating carrier's service. If the customer fails to select a terminating carrier, the carrier earth station operator will make the selection.[11]

9. The services of terminating carriers are presently incorporated in tariffs they file with the Commission and thus are offered on a nondiscriminatory basis to all earth station operators. We note that an earth station operator may believe that it can best serve its customers' interests by entering into voluntary carrier-to-carrier arrangements with terminating carriers in which elements of proportionate return play a role. Such arrangements would be appropriate assuming they are not unjust or unreasonably discriminatory and, of course, they do not violate the principles of antitrust law. In any case, the terms of such agreements or any other contracts between the earth station operators and the terminating carriers would be available for public scrutiny pursuant to the filing requirements of Section 211 of the Communications Act of 1934.[12]

10. We will not mandate retention of the rotational method of allocation because, as stated *supra* at para. 7, we believe that allowing earth station operators the authority to select any method of allocation that is not unjustly or unreasonably discriminatory will better promote competition in the provision of telex service and will best serve the public interest. We also will not adopt any rigid allocation formula because we believe our current policy better serves our competitive goals. We believe that the earth station operator is better positioned to know what allocation approach will better serve its, and its customer's, needs. Thus, rather than require an earth station operator to rigidly allocate traffic in any particular manner, we instead permit

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[8] *Order Inviting Comments to Supplement the Record*, 7 FCC Rcd 2579 (Common Carrier Bureau 1992).

[9] The current rotational method guarantees to each terminating carrier an equal share of unrouted ship-to-overseas telex traffic regardless of the price and quality of the service offered by the terminating carrier.

[10] In 1986, COMSAT handled 550,999 minutes of ship-to-overseas telex traffic. By 1991, this volume had more than doubled to 1,364,377 minutes. Comments of COMSAT at Table 2; Corrected Copy of COMSAT Supplemental Comments at Table 4.

[11] The record indicates that, although shipboard originators of ship-to-overseas telex traffic have the opportunity to select a terminating carrier based upon competitive considerations, only a small percentage do so.

[12] 47 U.S.C. §211.

that operator flexibility to choose a terminating carrier or carriers based on the merits of those carriers' services. This better serves our competitive goals because if a terminating carrier offers an improvement in service or a reduction in rates, the earth station operator would not be precluded by any Commission-sanctioned formula from routing traffic to this more competitive carrier as long as that earth station operator's actions are not unjustly or unreasonably discriminatory. The earth station operator should benefit from this flexibility by being able to offer a better package of services to its customers and thus compete more effectively with other earth station operators. We believe this approach should stimulate competition in the earth station operator market, as well as the terminating carrier market, to the benefit of consumers.

IV. CONCLUSION

11. We decline to mandate any particular allocation method for ship-to-overseas telex services not routed to a particular carrier by the shipboard originator.[13] We instead maintain our existing non-discrimination policy and, consistent with that policy, both encourage entities to become earth station operators and permit these earth station operators, provided they do not engage in unjust or unreasonable discrimination, the flexibility to choose a terminating carrier or carriers based on the merits of those carriers' services.

V. ORDERING CLAUSES

12. Accordingly, IT IS ORDERED, pursuant to Sections 4(i), 4(j) and 303(r) of the Communications Act of 1934, as amended, 47 U.S.C. §§154(i), (j), 303(r) and Section 504(c)(6) of the International Maritime Satellite Telecommunications Act, 47 U.S.C. §753(c)(6), that COMSAT and other United States coast earth station operators that provide service through INMARSAT space segment shall not be required to utilize any particular allocation method for distributing unrouted ship-to-overseas telex traffic, but may instead continue to distribute unrouted ship-to-overseas telex traffic as described in this Report and Order.

13. IT IS FURTHER ORDERED that CC Docket No. 88-245 IS TERMINATED.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

[13] We strongly encourage each shipboard originator of telex traffic to evaluate the carriers offering terminating telex service to overseas points and to choose a carrier to best meet its needs. If the shipboard originating customer fails to make that choice, it would be reasonable to assume that the originator is delegating that responsibility to the earth station operator that it has chosen.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Cable Operators' Petitions
for Reconsideration and
Revocation of Franchising
Authorities' Certifications
to Regulate Basic Cable Service
Rates

ORDER

Adopted: July 28, 1994; Released: July 29, 1994

By the Chief, Cable Services Bureau:

1. Under the Commission's Rules, a cable system is presumed not to be subject to effective competition unless the cable system demonstrates otherwise. *See* 47 C.F.R. § 76.906. Thus, a cable system which files a petition for reconsideration challenging a franchising authority's basic rate certification on the grounds of effective competition bears the burden of rebutting this presumption. *See* 47 C.F.R. § 76.911(b). The Cable Services Bureau's review of the pending petitions for reconsideration (as well as petitions for revocation and associated pleadings) indicates that many cable systems have submitted insufficient information to support a claim of effective competition. In addition, some franchising authorities that have submitted oppositions have failed to support their allegations. We intend, by this *Order*, to provide guidance as to the types of information which we will rely upon in reviewing pending and future petitions alleging the presence of effective competition. In addition, we provide a window of opportunity not to exceed twenty-one days from the release date of this *Order* during which cable systems and franchising authorities may, if they so desire, file supplements to their pending petitions and associated pleadings.

Reconsideration and Revocation Filings

2. Currently, there are over 100 petitions for reconsideration or revocation pending in which the cable system has alleged that it is exempt from rate regulation because it is subject to effective competition. The Bureau's review of each petition and associated pleading reveals a number of common deficiencies:

(1) **No specific facts to support claim of effective competition.** Some petitions do not include specific facts to support the claim of effective competition. Cable systems that allege that their penetration level is less than 30% must state the number of subscribers and the number of households within the franchise area. Systems alleging that they face competition from another multichannel video programming distributor ("MVPD") must state specific facts demonstrating that the competing MVPD is technically available, is actually available and that it provides comparable programming. *See Report and Order and Further Notice of Proposed Rulemaking* in MM Docket No. 92-266, 8 FCC Rcd 5631, 5654, 5656, 5665-5667 (1993) ("Rate Order").[1] For example, cable systems that argue that they face competition from another cable system must provide the number of households passed in the franchise area by each cable system allegedly serving the franchise area. In addition, they must submit evidence demonstrating that the service of the competing cable system is actually available to potential subscribers in the franchise area. Moreover, they must demonstrate that the other cable system offers comparable programming. Finally, the petitioning cable system must include the number of households subscribing to the cable systems serving the franchise area.

(2) **Failure to Submit Information Showing Effective Competition Claims Based On the Franchise Area. In the *Rate Order*, the Commission stated that the determination of effective competition must be made on the basis of the franchise area.** *See* Rate Order, at 5672. Our review of the petitions indicates that some cable systems apparently claim to face effective competition in more than one franchise area. However, many of these systems fail to provide relevant facts and supporting documentation for each of these franchise areas. Cable systems alleging that their penetration level is less than 30% in more than one franchise area, must provide the relevant subscriber and household data for each franchise area in question. Likewise, cable systems alleging that they face competition from another MVPD must submit the relevant supporting information (including data demonstrating that the other MVPD has authority to serve and actually does serve the same franchise area as the petitioning cable system) for each franchise area in question.

(3) **Failure to Use Recent Subscriber and Household Data.** Some petitions do not indicate the use of recent data to support claims of effective competition. An operator must demonstrate that its system was subject to effective competition at the time of certification. In order to demonstrate this, cable operators must rely on subscriber data as of or approximately as of the time of certification, but no earlier than two months before the request for certification was filed. Cable systems wishing to update their pending petitions with more recent subscriber data may do so. With respect to household data, we realize that in many cases 1990 census data represents the most recent data available. Accordingly, we believe that 1990 census data is an appropriate measure of households. Operators that have access to more recent data may submit such information if they so choose.

(4) **Failure to Submit a Copy of Subscriber and Household Data.** Most of the petitions fail to include a copy of the subscriber and household documentation relied upon as

[1] Service will be deemed technically available when the MVPD is physically able to deliver service to a household wishing to subscribe with only minimal additional investment by the distributor, if necessary. *Rate Order*, at 5654. Service is deemed actually available where there are no regulatory, technical or other impediments to households taking service and potential subscribers in a franchise area are made reasonably aware that the services of the MVPD can be purchased by them. *Rate Order*, at 5656. Finally, to offer "comparable" programming, MVPDs must provide at least 12 channels of programming, including at least one channel of nonbroadcast service programming. *Rate Order*, at 5667.

support for the alleged effective competition. Cable systems alleging that their penetration level is below 30% should include the subscriber and household documentation relied upon. Cable systems alleging that they face competition from another MVPD must include a copy of the information upon which they are relying to support this claim (such as, for example a copy of the page from the census information or the computer printout containing the number of subscribers).[2] Cable systems that desire to supplement their petitions with copies of this information may take this opportunity to do so.

(5) **Failure to Explain Additions or Deletions of Subscriber and Household Data**. A review of some petitions indicates that some cable systems do not adequately explain the subtractions or additions to households or subscribers. For example, in some cases, cable systems submit the specific household data for a particular county, but do not submit sufficient information to explain the subtraction or addition of a separately listed town or village located within the county. In other cases, a cable system provides a number for subscribers but does not explain the deletion or addition of certain types of subscribers. Cable systems engaging in such modifications of household and subscriber data must include an explanation describing the nature, reasons, and support for such modifications.

(6) **Local Franchising Authorities' Failure to Support Claims that the Cable System Has Redefined Its Franchise Area**. In most of the opposed petitions for reconsideration or revocation, the franchising authority has argued that the cable system has redefined its franchise area. However, the Bureau's review of these oppositions indicates that in many cases the franchising authority has not submitted sufficient information for us to resolve this issue. Franchising authorities arguing that the cable system has redefined its franchise area should submit evidence such as for example, a copy of the franchise agreement demonstrating the cable system's authorized franchise area, a copy of a map demonstrating the system's actual service area in relation to the area it is authorized to serve, the length of time in which the system has been authorized to serve a given area, the length of time in which the operator has served the alleged limited area, and any evidence that the cable system has refused requests to expand service.

Window of Opportunity to Supplement Pleading

Cable systems and franchising authorities have twenty-one days from the release date of this Order to file, if they so choose, supplements to their pending petitions for reconsideration or revocation and oppositions in accordance with the above-listed guidelines.[3] This opportunity applies only to cable systems and franchising authorities that are actively participating in a pending petition for reconsideration or revocation proceeding. A franchising authority which has not filed a timely opposition to a petition for reconsideration or revocation in accordance with our rules may not take this opportunity to do so.

ORDERING CLAUSES

3. Accordingly, **IT IS ORDERED**, pursuant to Section 4(i) of the Communications Act of 1934, as amended, 47 U.S.C. § 154(i), and Section 0.321 of the Commission's Rules, 47 C.F.R. § 0.321, that those cable operators and franchising authorities wishing to supplement their petitions and responsive pleadings as discussed herein **SHALL REFILE** no later than 21 days from the release date of this *Order*.

4. Pleadings filed pursuant to this *Order* must clearly indicate on the first page the name of the proceeding, the name of the filing party, the name of the franchising authority, and the FCC Community ID Number. In addition, a pleading should conspicuously note that it is a supplement being filed pursuant to this *Order*. Communications Commission, Room 222, 1919 M Street, N.W., Washington, D.C. 20554.

5. Interested parties should direct questions to Lisa M. Higginbotham, Cable Services Bureau, Consumer Protection Division, at (202) 416-0851.

FEDERAL COMMUNICATIONS COMMISSION

Meredith J. Jones
Chief, Cable Services Bureau

[2] We remind cable operators and any MVPD competitors that Section 76.911(b)(2) allows cable systems to request from a competitor information regarding the competitor's reach and number of subscribers. A competitor must respond to such a request within 15 days. Responses may be limited to numerical totals. 47 C.F.R. § 76.911(b)(2).

[3] We note that we have already sent letters to some cable operators informing them of the specific information which they should submit and the applicable deadlines for submission.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Midyear 1986 Transmittal No. 56
Access Tariff Filings

Ameritech Operating Companies
Tariff F.C.C. No. 2

ORDER

Adopted: July 29, 1994; Released: July 29, 1994

By the Chief, Tariff Division:

1. The Ameritech Operating Companies (Ameritech) filed a petition for indefinite continuation of waiver[1] of that portion of the Commission's *December 19 Order*,[2] directing local exchange carriers (LECs) to provide originating WATS access lines (WALs) with Feature Group A (FGA) and Feature Group B (FGB) services. A number of LECs, including Ameritech, previously were granted waivers of this requirement.[3] These waivers are scheduled to expire on August 1, 1994. Ameritech's waiver petition is unopposed.

2. In general, Ameritech states that in order to provide WALs with FGA and FGB it would need to modify its billing systems. It asserts that there is no demand for the service and that it would be unreasonable to incur the cost and divert resources necessary to offer a service that no intexchange carrier (IXC) will order.

3. The pending waiver request filed by Ameritech is similar to those filed previously by various LECs. As there continues to be no demand for the service at issue and the costs of providing the service are not insignificant, we conclude that a further one-year extension of the request is warranted on condition that these carriers continue to offer IXCs free WALEs where necessary.

4. Accordingly, IT IS ORDERED that the petition for waiver filed by Ameritech Operating Companies IS GRANTED, to the extent specified herein.

5. IT IS FURTHER ORDERED that all similarly situated LECs ARE ALSO GRANTED an extension of existing waivers to the extent specified herein, and that the waivers granted by this Order SHALL EXPIRE on August 1, 1995.

FEDERAL COMMUNICATIONS COMMISSION

Gregory J. Vogt
Chief, Tariff Division
Common Carrier Bureau

[1] Petition for Continuation of Waiver, filed by Ameritech Operating Companies, July 18, 1994.
[2] Midyear 1986 Access Tariff Filings, 1 FCC Rcd 1247 (1986) (*December 19 Order*).
[3] *See e.g.*, Ameritech Operating Companies, Tariff F.C.C. No. 2, Petition for Continuation of Waiver, 7 FCC Rcd 4984 (Com. Car. Bur. 1992).

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

SAMMONS COMMUNICATIONS, INC.

Request for Stay
of Enforcement of Local
Rate Order of City of
Glendale, CA.

ORDER

Adopted: July 26, 1994; Released: July 27, 1994

By the Chief, Cable Services Bureau:

1. Sammons Communications, Inc. ("Sammons"), the franchisee in the above matter, filed on May 18, 1994 a Request for Stay of the local rate order adopted April 18, 1994 by its franchising authority, the City of Glendale, California ("Glendale").[1] In the local rate order, Glendale established regulated rates for basic cable service and associated equipment, provided by Sammons, as required by the Cable Television Consumer Protection and Competition Act of 1992.[2] Glendale accepted the basic service rate proposed by Sammons, but prescribed a reduction in Sammons' hourly service charge and related equipment rates. Sammons was ordered to refund to subscribers the overage back to September 1, 1993. This refund liability, Sammons argues, is in excess of permitted levels.

2. Sammons seeks a stay of the local rate order pending Commission resolution of its appeal on the merits. Glendale has not submitted any papers in opposition to Sammons' Request for Stay.

3. The Commission evaluates petitions for stay under well settled principles. To support a stay, petitioners must demonstrate: (1) that they are likely to prevail on the merits; (2) that they will suffer irreparable harm if a stay is not granted; (3) that other interested parties will not be harmed if the stay is granted; and (4) that the public interest favors the granting of a stay.[3] As discussed below, resolution of this stay petition centers primarily on the strength of petitioner's argument regarding the first prong of this test.

4. We believe the Commission should not conduct de novo review of local rate decisions and that the standard of review should be whether there is a reasonable basis for the franchising authority's decision. The Commission will defer to the judgment of the local franchising authority provided that there is a rational basis for the decision.

5. However, as we explained in *TCI Cablevision of St. Louis, Inc.*, DA 94-424 (Rel. April 29, 1994), if a franchising authority approves the cable operator's proposed rates for basic cable service while reducing permitted equipment rates, without allowing an offsetting increase in the tier charge for basic service, the franchising authority is requiring refunds of liability in excess of maximum levels permitted by Commission regulations. We emphasized our expectation that franchising authorities adhere strictly to the mathematical principles underlying the benchmark methodology, particularly when calculating an operator's refund liability.[4]

6. Because Sammons' submission appears to show that a misapplication of our rules may have occurred, and because Glendale has not filed any opposition, we grant Sammons' Request for Stay, pending full review of this case on the merits. In order to protect the interests of subscribers, we will require Sammons to place in an interest-bearing escrow account the sum Glendale has ordered to be refunded, and accumulate in the escrow account the difference between the rates ordered by the City and the prices charged by Sammons as subscriber fees are collected during the period of the stay. Sammons must furnish the Commission with documentation demonstrating its compliance with this Order within thirty (30) days of the release of this Order. Finally, Sammons must notify all subscribers of the possibility that they may receive a refund, and advise subscribers who may be planning to relocate outside the franchising area to provide Sammons with a forwarding address to which refunds may be delivered.[5]

7. Accordingly, IT IS ORDERED, pursuant to §1.45(e) of the Commission's rules (47 C.F.R. §1.45 (e)), that the local rate order adopted by the City of Glendale, California is STAYED pending our resolution of this appeal. This action is taken by the Chief, Cable Services Bureau, pursuant to authority delegated by §0.321 of the Commission's rules (47 C.F.R. §0.321).

8. IT IS FURTHER ORDERED that the amount of the refunds required in Glendale's local rate order, and the amount of the difference between rates ordered by Glendale and the subscriber fees collected during the period of the stay, SHALL BE PLACED by Sammons in an interest-bearing escrow account, and that proof of this shall be filed with the Commission within thirty (30) days of the release of this order. Interest shall accrue at the prevailing U.S. Internal Revenue Service Rate.

9. IT IS FURTHER ORDERED that this Order is effective upon adoption.

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[1] Along with its Request for Stay, Sammons filed an Appeal From a Rate Order of the City of Glendale, California on May 18, 1994.

[2] Pub. L. No. 1002-385, 106 Stat. 1460 (1992); Communications Act, § 623(b), 47 U.S.C. § 543(b).

[3] See *Wisconsin Gas Co. v. FERC*, 758 F. 2d 669, 673-74 (D.C. Cir. 1985) (per curiam); *Washington Metropolitan Area Transit Comm'n v. Holiday Tours, Inc.*, 559 F.2d 841, 842-43 (D.C. Cir. 1977); *Virginia Petroleum Jobbers Ass'n v. FPC*, 259 F.2d 921, 925 (D.C. Cir. 1958).

[4] *TCI Cablevision of St. Louis, Inc.* at para. 7.

[5] We are not prejudging the method of refund to be used by Sammons in the event Sammons does not prevail on appeal. Rather, we take this action to ensure that all options remain open. 47 C.F.R. §76.942.

FEDERAL COMMUNICATIONS COMMISSION

Meredith J. Jones
Chief, Cable Services Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In the matter of

Amendment of Parts 0 and 1
of the Commission's Rules
to Reflect a Reorganization
of Multipoint and Multichannel
Multipoint Distribution
Service Regulation

ORDER

Adopted: June 9, 1994; **Released: July 21, 1994**

By the Commission:

1. The Commission has before it for consideration changes in the organizations of the Mass Media and Common Carrier Bureaus. Implementation of these changes requires amendments to Parts 0 and 1 of the Commission's Rules and Regulations.

2. In order to consolidate processing of requests for licenses that may be used to provide so-called "wireless cable" services in one organization, the Commission is transferring responsibility for MultiPoint Distribution Services and Multichannel Multipoint Distribution Services from the Common Carrier Bureau to the Mass Media Bureau. The rules adopted herein reflect this action.

3. The amendments adopted pertain to agency organization. The prior notice procedure and effective date provisions of Section 553 of the Administrative Procedure Act are therefore inapplicable. Authority for the amendments adopted herein is contained in Sections 4(1), 5(b), 5(c)(1), and 303(r) of the Communications Act of 1934, as amended.

4. IT IS ORDERED, effective upon publication in the Federal Register that Parts 0 and 1 of the Rules and Regulations are amended as set forth in the Appendix hereto.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

Final Rules

Parts 0 and 1 of Chapter I of Title 47 of the Code of Federal Regulations are amended as follows:

PART 0 - COMMISSION ORGANIZATION

1. The authority citation for Part 0 continues to read as follows:

Authority: Secs. 5, 48 stat. 1068, as amended; 47 U.S.C. 155.

2. Section 0.61 is amended by revising paragraph (a) to read as follows:

Section 0.61 Functions of the Bureau.

* * * * *

(a) Process applications for authorizations in radio and television services, including conventional and auxiliary broadcast services, multi-point and multi-channel multipoint distribution services, and direct broadcast satellite services.

* * * * *

3. Section 0.91 is amended by revising the first paragraph to read as follows:

Section 0.91 Functions of the Bureau.

The Common Carrier Bureau develops, recommends and administers policies and programs for the regulation of services, facilities, rates and practices of entities (excluding public coast stations in the maritime mobile service and multi-point and multi-channel multi-point distribution services) which furnish interstate or foreign communications service for hire -- whether by wire, radio, cable or satellite facilities -- and of ancillary operations related to the provisions or use of such services. The Bureau also regulates the rates, terms, and conditions for cable television pole attachments, where such attachments are not regulated by a state and not provided by railroads or governmentally -- or cooperatively owned utilities. The Bureau also performs the following specific functions:

* * * * *

4. Section 0.453 is amended by revising paragraph (g) to read as follows:

Section 0.453 Public reference rooms.

* * * * *

(g) *The Common Carrier Bureau, Domestic Facilities Reference Room.* The following documents, files and records are available for inspection at this location.

(1) Microwave Point-to-Point and Digital Electronic Message Service (DEMS) application files and related materials.

(2) Space and earth station files and related materials.

(3) Section 214 applications and related files.

* * * * *

PART 1 - PRACTICE AND PROCEDURE

1. The authority citation for Part 1 continues to read as follows:

Authority: Secs. 4, 303, 48 Stat. 1066, 1082, as amended; 47 U.S.C. 154,303; Implement, 5 U.S.C. 552, unless otherwise noted.

2. Section 1.821 is amended by revising the first paragraph to read as follows:

Section 1.821 Scope.

Where action on applications is permitted under authority delegated to either the Chief, Common Carrier Bureau, or the Chief, Mass Media Bureau, the provisions of this section, including provisions incorporated by reference, shall apply to applications for permits and licenses in the following services:

* * * * *

Before the
Federal Communications Commission
Washington, D.C. 20554

MM Docket No. 93-155

In re Application of

RICHARD BOTT II File No. BAPH-920917GO
(Assignor)

and

WESTERN COMMUNICATIONS, INC.
(Assignee)

For Assignment of Construction Permit of Station KCVI(FM), Blackfoot, Idaho

Appearances

James P. Riley, Esquire, and *Anne G. Crump, Esquire*, on behalf of Richard Bott, II; and *Y. Paulette Laden, Esquire*, on behalf of the Chief, Mass Media Bureau, Federal Communications Commission.

INITIAL DECISION OF ADMINISTRATIVE LAW JUDGE ARTHUR I. STEINBERG

Issued: July 25, 1994; Released: August 4, 1994

PRELIMINARY STATEMENT

1. Richard Bott, II ("Bott"), one of the applicants in the above-captioned proceeding, by his counsel, pursuant to Section 1.1501 *et seq.* of the Commission's Rules, applies for an award of attorney's fees and other expenses in accordance with the Equal Access to Justice Act ("EAJA"), 5 U.S.C. 504. The Chief, Mass Media Bureau ("Bureau"), by his counsel, opposes grant of the relief sought under the EAJA.[1]

FINDINGS OF FACT

The Blackfoot Comparative Proceeding

2. On July 11, 1985, Bott filed an application for a construction permit ("CP") for a new FM station in Blackfoot, Idaho. (Tr. 89.) Competing applications were filed by six other applicants, including Radio Representatives, Inc. ("RRI"). By *Hearing Designation Order*, 2 FCC Rcd 3897, released July 1, 1987, the applications of Bott, RRI, and three of the other applicants were designated for comparative hearing. The hearing was held on December 7, 1987. (MMB Ex. 2.) During the hearing, Bott claimed an integration preference based on his commitment to move to Blackfoot and serve as the full-time general manager of his proposed station. (MMB Ex. 1; MMB Ex. 3, pp. 21, 28; Bott Ex. 3, pp. 20, 22.) Bott also testified at the comparative hearing that he had not as yet decided on the format of his proposed station. (MMB Ex. 2, pp. 55-56, 67-68, 89-90.)

3. The following are excerpts of Bott's testimony at the comparative hearing with respect to his commitment to move to Blackfoot and the format of his proposed station. The testimony was adduced on cross-examination by opposing counsel.

> Q: Approximately when did that decision [to move to Blackfoot] come?
>
> A: Last summer [1987] when both facilities became designated for hearing simultaneously for all practical purposes. I realized at that point I was going to have to make a decision where I was going to live and make my home. At that time then I decided that Blackfoot, Idaho would be where I would make my home due to a number of factors including the fact that this is a class C station with much broader coverage as opposed to the class A in Central Valley [California]. It was last summer [1987] that I made my decision to move and live in Blackfoot.

(MMB Ex. 2, p. 19.)

* * *

> Q: Maybe this goes back to an earlier question, but do you intend to leave Bott Communications irregardless [*sic*] of the grant of this [Blackfoot] application or [are] you only intending to leave Bott Communications --
>
> A: Do you mean Bott Broadcasting?
>
> Q: Yes, Bott Broadcasting.
>
> A: If I could digress for a moment which will help clarify the question, I think, that you're asking. That is that the situation in Blackfoot represents an opportunity for me to get out into business on my own and to have my own radio station and build something for myself.

(*Id.* at p. 51.)

[1] Under consideration are an Application for Award Pursuant to the Equal Access to Justice Act, filed on April 18, 1994, by Bott; Mass Media Bureau's Answer to Application for Award Pursuant to the Equal Access to Justice Act, filed on May 11, 1994; and Response to Answer of Mass Media Bureau, filed on May 26, 1994, by Bott.

* * *

Q: Okay. The format of the other stations that Bott Broadcasting currently owns is essentially what? How do you best describe it?

A: As you characterized it in the deposition, it is essentially a religious-oriented format although I like to think that it's different from the way most religious stations are characterized. It's a format that is designed to serve the needs and interests of families including their religious and spiritual needs but also a lot of information, news, talk, public affairs and so forth. So it's a blend of several different things including a good portion of religious programming.

Q: Isn't it true that you also intend to engage in a similar sort of format for the Blackfoot facility?

A: No, that's not necessarily true. I've not decided exactly the type of format, the type of music or whatever that I would use in that facility. It would be a format tailored to that particular market and the needs of that community.

(*Id.* at pp. 55-56.)

* * *

[In response to a series of questions as to whether there had been discussions between Bott and his father concerning the programming to be carried on Bott's Blackfoot station:]

A: . . . If I could just say that my programming decisions are going to be my own decisions and I'm going to look at the programming sources that are available to me in addition to the programming that we're going to produce locally and make my decisions at the appropriate time. . . .

(*Id.* at pp. 67-68.)

* * *

Q: Okay. Assuming you get this grant do you have any plans right now to only own this property for a finite period of time?

A: No, I have no plans to sell it if that's what you mean.

Q: That's what I meant. And in your [direct written] testimony you say that you intend to establish a domicile in Blackfoot. Is that correct?

A: Yes.

Q: Do you intend to maintain any other residences anywhere else in the country at the time that you have your domicile in Blackfoot?

A: No, I intend to live in Blackfoot.

Q: No other residences anywhere else?

A: No.

Q: And it's your intention to, for all intents and purposes, for the foreseeable future to live there forever?

Bott's Counsel: Objection, Your Honor. Forever is irrelevant.

RRI's Counsel: Your Honor, I disagree because the Commission's policy is that integration proposals should be on a permanent basis. Permanent is equated, I believe, to forever.

Presiding Judge: I think an indefinite period of time would be enough. I don't think he should commit himself to forever living in any one place. If you want to ask the witness whether he intends to stay in Blackfoot for an indefinite time, that's okay.

Q: Do you intend to live in Blackfoot for an indefinite period of time?

A: Yes.

(*Id.* at pp.72-73.)

* * *

Q: I believe your testimony is you resigned [*sic*] your position of employment with Bott Broadcasting Inc. Do you intend to resign as either a vice president or a director of Bott Broadcasting Inc.?

A: Well, my intention is to quit my job there so I can go move and live in Blackfoot. I don't have an intention specifically to cease being an officer or director; however, they may choose to elect somebody to replace me but that would be a decision of the Board of Directors. They haven't made a decision on that one way or the other.

(*Id.* at p. 87.)

* * *

Q: . . . Have you made arrangements for a home or apartment in Blackfoot as of [this] date?

A: Well, yes, to a certain extent. That's one of the reasons I went out to visit [Blackfoot in September 1987] because I wanted to see the homes that the real estate agent had been picking out for me. I saw two or three of them with him and he was supposed to get some more possibilities, but I'm working on that.

Q: To purchase a home there?

A: Yes, it would be premature to buy one before this case is settled but I have been investigating that.

Q: I was wondering whether the decision was to purchase a home or to lease an apartment.

A: Well, I haven't made a firm decision whether I'd buy or rent, but there's not much available in Blackfoot to rent so it appears that the best thing would be to buy something. The housing is fairly reasonable there.

(*Id.* at pp. 87-88.)

* * *

Q: Do each of the Bott stations, and again I use an umbrella term for Bott Broadcasting and Bott Communications, receive the same programming, that is the two talk shows and the news service?

A: Yes, they do. Those particular ones. There is some programming similarity. It's not identical but those particular shows they all get.

Q: You would consider contracting for these same shows at your Blackfoot facility should you receive it?

A: Should it be compatible with the format that I choose. Like I say I've not chosen the exact format and that would be one thing that I would certainly consider.

(*Id.* at pp. 89-90.)

4. Bott's CP application was granted and that of RRI and one other applicant were denied on the basis of Bott's integration preference. Thus, Bott was awarded 100 percent integration credit, which was enhanced by his commitment to move to Blackfoot, whereas RRI was awarded no integration credit and the third applicant was awarded 50 percent credit. *Initial Decision*, 3 FCC Rcd 7094 (ALJ 1988). Although RRI appealed to the Review Board and the Commission, the determination reached in the *Initial Decision* was upheld. *Richard P. Bott, II*, 4 FCC Rcd 4924 (Rev. Bd. 1989), *rev. denied* 5 FCC Rcd 2508 (1990). RRI's subsequent appeal to the U.S. Court of Appeals was also denied. *Radio Representatives, Inc. v. FCC*, 926 F.2d 1215 (D.C. Cir. 1991) (*aff'd by judgment*). In this connection, RRI argued to the Court of Appeals that Bott would not carry through on the integration pledge he made to the Commission. Bott responded: "This claim is wide of the mark." (MMB Ex. 3, pp. 1-2.)

The Petition to Deny and Related Pleadings

5. Bott was issued the CP for his proposed Blackfoot facility on December 18, 1991. (Joint Ex. 1, p. 2.) Nine months later, on September 17, 1992, Bott filed the above-captioned application to assign that permit to Western Communications, Inc. ("Western"). (Official notice taken.) A Petition to Deny the assignment application was filed by RRI on October 26, 1992. (MMB Ex. 3.) Bott filed an Opposition to Petition to Deny on November 10, 1992 (MMB Ex. 4), to which RRI filed a Reply to Opposition to Petition to Deny on November 23, 1992 (MMB Ex. 5). On December 8, 1992, Bott filed a Request for Leave to Respond and Response. (MMB Ex. 6.) RRI filed a Supplement to Petition to Deny on May 14, 1993 (MMB Ex. 7), and by letter dated May 19, 1993, then counsel for Bott notified the Commission that no response to the Supplement would be filed (MMB Ex. 8).

6. In its Petition to Deny, RRI contended that the assignment application must be designated for hearing pursuant to Section 73.3597(a) of the Commission's Rules because Bott proposed to assign his CP within one year of its grant. (MMB Ex. 3, p. 3.) RRI further argued that the sole basis for the grant of Bott's application was his receipt of 100 percent integration credit (*id.* at pp. 2, 3-4); that Bott continually represented to the Commission, as well as to the Court of Appeals, that he would move to Blackfoot and fulfill his integration pledge (*id.* at pp. 5-6); that Bott abandoned his integration pledge and his commitment to move to Blackfoot (*id.* at p. 6); that Bott's actions made a "mockery" of the comparative proceeding in which Bott was awarded the CP (*id.);* and that a grant of the assignment application "would undermine the very foundation of the Commission's comparative hearing process" (*id.* at p. 7).

7. In his Opposition to Petition to Deny, Bott argued that "significant changed circumstances affecting his proposed construction and operation of the Blackfoot station occurred *subsequent* to the acquisition of the permit" (MMB Ex. 4, p. 5; emphasis in original); that RRI's reliance on Section 73.3597(a) of the Rules was misplaced (*id.* at p. 6); that a grant of the assignment application would do no violence to the integrity of the Commission's licensing process (*id.* at pp. 6-7); and that Bott would not profit from the assignment (*id.*).

8. In a declaration under penalty of perjury appended to his Opposition, Bott stated that throughout the comparative hearing process "it remained [his] intention and plan to build the station in Blackfoot, move there and personally run the station full time if and when [he] received the C.P." (MMB Ex. 4, p. 9); that *after* the CP grant was affirmed by the Court of Appeals in February 1991, he "proceeded with more detailed planning for the station [and] . . . decided that [he] would operate the station with a religious format" (*id.* at pp. 9-10); that this decision was based upon his prior experience with religious format stations, the overall worsening of the economy, his knowledge that he "could still successfully operate the station and serve the community with a religious format," his contacts with potential clients, "and there was an opening in the market for that format" (*id.* at p. 10).

9. Bott's declaration further stated that in September 1991 he learned that the opening in the market for a religious format station had closed. At that time, Bott was informed that The Calvary Chapel Church had just purchased FM station KRSS, Chubbock, Idaho, that KRSS would serve much the same market area Bott's station was proposing to serve, that KRSS was planning to increase power, and that it would use a format very similar to the one Bott was planning to use. (MMB Ex. 4, p. 10.) Bott stated that this "dramatically changed the competitive situation in the market" because the church had a "tremendous head start," and the market was too small and the economy too soft to support two commercial religious stations. (*Id.*) Nevertheless, Bott stated, throughout the remainder of 1991 and into 1992 he proceeded with planning for construction of his station, ultimately contacting Kent Frandsen, the owner of Bott's proposed tower, "to proceed with my plans to install my antenna on his tower." (*Id.* at p. 11.) Bott's declaration stated that, over the course of several conversations, Frandsen inquired about purchasing the CP. After first telling him it was not for sale, Bott elected to sell the CP after his then attorney advised him that the Commission allowed him to do so provided that he receive as compensation only his expenses. (*Id.*) Bott stated that he thought that in the poor economy a duopoly operation, as Frandsen would operate the Blackfoot station, represented the best hope for a successful operation. (*Id.*)

10. As noted above, RRI filed a Reply to Opposition to Petition to Deny. In the "Summary" section of its Reply, RRI stated: "For the first time, Bott has revealed that his integration pledge has always been contingent on his ability to establish a profitable, religious station, which itself is

inconsistent with the integration pledge made in this proceeding." (MMB Ex. 5, p. 2.) Similarly, in the "Background" portion of its Reply, RRI further stated that: "Bott claim[ed] that he pursued the permit in order to construct a commercial religious station, . . ." (*Id.* at p. 7.) RRI also argued that Bott's failure to fully disclose the contingent nature of his integration promises constituted "fraud on the Commission's processes" (*id.* at p. 8), and that Bott had not alleged sufficient changed circumstances to warrant a grant of the assignment application (*id.* at pp. 13-16). In addition, RRI alleged that Bott's proposed station would serve a much larger area and population than would be served by station KRSS (*id.* at pp. 16-17), and that Bott's claims of competitive disadvantage and loss of a good market opportunity were, therefore, "false" (*id.* at pp. 17-18). In support of the latter assertions, RRI attached a lengthy engineering study to its Reply. (*Id.* at pp. 22-91.) This study concluded, *inter alia,* that Bott's proposed station would serve an area 3.1 times the size and a population 2.1 times greater than that of station KRSS's upgraded facility. (*Id.* at p. 22.) Bott did not challenge these figures. (MMB Ex. 6.)

The Hearing Designation Order in this Proceeding

11. As a consequence of the Petition to Deny and related pleadings, by *Hearing Designation Order and Notice of Opportunity for Hearing,* 8 FCC Rcd 4074, released June 15, 1993 (*"HDO"*), the Commission designated for hearing the above-captioned application of Bott and Western for assignment of the CP of Station KCVI(FM), Blackfoot, Idaho. The following issues were specified:

> (a) To determine whether Richard P. Bott II has misrepresented facts to or lacked candor with the Commission, either in connection with his integration pledge presented in the course of the Blackfoot, Idaho comparative hearing proceeding, or in his opposition to the petition to deny filed in the instant proceeding.
>
> (b) To determine, in light of the evidence adduced pursuant to issue (a), whether Richard P. Bott II is qualified to remain a Commission permittee.
>
> (c) To determine, in light of the evidence adduced pursuant to the foregoing issues, whether the captioned application should be granted.

(*HDO* at para. 14.)

12. In its rationale for the specification of the misrepresentation/lack of candor issue against Bott, the *HDO* noted that "the Commission has clearly indicated its basic concern with the integrity of its licensing process" (*HDO* at para. 8; citation omitted); that Bott prevailed in the comparative proceeding essentially on the basis of his integration proposal (*id.* at para. 9); that Bott, in prosecuting his CP application, "unambiguously, unconditionally, and repeatedly" pledged to relocate to Blackfoot and be fully integrated in his proposed station (*id.);* and that Bott's pledges were not contingent on the practicality of introducing a commercial religious or any other particular format (*id.).* The *HDO* also asserted that, in opposing RRI's Petition to Deny, "*Bott state[d]* that throughout the six-year effort to obtain his permit he maintained a good faith intention to *both* move to Blackfoot *and operate KCVI as a commercial facility with a religious format.*" (*Id.* at para. 3; emphasis added.) The *HDO* further maintained that "*Bott ha[d] represented* in the instant proceeding that, throughout the comparative proceeding, *he always intended to operate with a commercial religious format. . .*" (*Id.* at para. 9; emphasis added.)

13. The *HDO* determined that Bott's failure to qualify his integration pledge raised questions as to whether he had misrepresented facts or lacked candor either in his statements made during the course of the comparative hearing or in the assignment proceeding. Specifically, the *HDO* stated that "it is proper to inquire into why, if Bott previously represented that he intended to proceed without having chosen a particular format, the format issue became so critical later." (*HDO* at para. 10.) The *HDO* additionally questioned "the credibility of Bott's 'justification' for not proceeding with his announced plans for KCVI" in light of RRI's assertions in its Reply that KCVI would serve a substantially greater area and population than KRSS would serve. (*Id.* at para. 11.) The *HDO* found that this called into question Bott's rationale for assigning rather than constructing KCVI. (*Id.)* The *HDO,* therefore, concluded that substantial and material questions of fact were raised which required designation of the assignment application for hearing. (*Id.* at para. 13.)

14. In addition, the *HDO* stated that, irrespective of whether the hearing record warranted an order denying the assignment application, it shall be determined whether an order of forfeiture in an amount not to exceed $250,000 shall be issued against Bott for willful and repeated violations of Section 73.1015 of the Commission's Rules (submitting truthful written statements and responses to the Commission). (*HDO* at para. 15.) Further, if certain circumstances occurred, the *HDO* made provision for the issuance of "an order to show cause why an order of revocation of [Bott's] construction permit . . . should not be issued." One such circumstance involved a final determination that Bott was not qualified to remain a permittee. (*Id.* at para. 18, footnote omitted; *modified, Order,* 8 FCC Rcd 7303, released October 8, 1993.)

Between Designation for Hearing and the Hearing

15. On June 25, 1993, ten days after the release of the *HDO,* Bott filed a Petition for Leave to File Petition for Reconsideration, and a Petition for Reconsideration. (Official notice taken.) Both pleadings were addressed to the Commission. In his Petition for Reconsideration, Bott requested the Commission to reconsider the *HDO,* delete the misrepresentation/lack of candor issue, which would moot the other two issues, and grant the assignment application. Bott argued that the *HDO's* specification of the misrepresentation/lack of candor issue was based on an erroneous reading of Bott's Opposition to Petition to Deny. Bott contended that critical facts cited in the *HDO* were inaccurate, and that certain allegedly conflicting statements the *HDO* attributed to Bott did not exist.[2] Bott further asserted

[2] The specific statements that Bott alleged as inaccurate were: (a) "Bott states [in his Opposition to Petition to Deny] that throughout the six-year effort to obtain his permit he maintained [an] . . . intention to . . . operate KCVI as a commercial facility with a religious format" (*HDO* at para. 3); (b) "The hearing record does not reveal any qualification to Bott's

* * *

Q: Do each of the Bott stations, and again I use an umbrella term for Bott Broadcasting and Bott Communications, receive the same programming, that is the two talk shows and the news service?

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Between Designation for Hearing and the Hearing

15. On June 25, 1993, ten days after the release of the *HDO*, Bott filed a Petition for Leave to File Petition for Reconsideration, and a Petition for Reconsideration. (Official notice taken.) Both pleadings were addressed to the Commission. In his Petition for Reconsideration, Bott requested the Commission to reconsider the *HDO*, delete the misrepresentation/lack of candor issue, which would moot the other two issues, and grant the assignment application. Bott argued that the *HDO's* specification of the misrepresentation/lack of candor issue was based on an erroneous reading of Bott's Opposition to Petition to Deny. Bott contended that critical facts cited in the *HDO* were inaccurate, and that certain allegedly conflicting statements the *HDO* attributed to Bott did not exist.[2] Bott further asserted

[2] The specific statements that Bott alleged as inaccurate were: (a) "Bott states [in his Opposition to Petition to Deny] that throughout the six-year effort to obtain his permit he maintained [an] . . . intention to . . . operate KCVI as a commercial facility with a religious format" (*HDO* at para. 3); (b) "The hearing record does not reveal any qualification to Bott's

that the *HDO* was inconsistent with recent Commission precedent. The Bureau opposed Bott's Petition for Leave to File, Bott replied to the Bureau's opposition, and the Bureau moved to dismiss the reply. (Mass Media Bureau's Opposition to Petition for Leave to File Petition for Reconsideration, filed on July 8, 1993; Reply to Opposition to Petition for Leave to File Petition for Reconsideration, filed on July 20, 1993, by Bott; Mass Media Bureau's Motion to Dismiss, filed on July 23, 1993; official notice taken.)

16. On July 6, 1993, Bott filed a Motion to Delete Issues, which was addressed to the Presiding Judge. (Official notice taken.) Bott requested that the Presiding Judge delete the misrepresentation/lack of candor issue for substantially the same reasons he urged upon the Commission for the deletion of that issue. The Bureau opposed Bott's motion to delete and Bott filed a reply to the Bureau's opposition. (Mass Media Bureau's Opposition to Motion to Delete Issues, filed on July 21, 1993; Reply to Opposition to Motion to Delete Issues, filed on August 2, 1993, by Bott; official notice taken.)

17. On July 15, 1993, Bott filed a Petition for Certification to Commission, which was addressed to the Presiding Judge. (Official notice taken.) Bott requested the Presiding Judge to certify to the Commission the question of whether the hearing in this proceeding should be held. Bott argued, once again, that this case was designated for hearing on the basis of an error of fact, and that the *HDO* was inconsistent with precedent. Bott maintained that certification was appropriate in order to give the Commission the opportunity to review the *HDO* with a correct understanding of the critical facts and law. The Bureau opposed the petition for certification. (Mass Media Bureau's Opposition to Petition for Certification to Commission, filed on July 27, 1993; official notice taken.)

18. On July 16, 1993, Bott served on the Bureau a Request for Admission. (Official notice taken.) Bott asked the Bureau to admit the truth of the following statement:

> Bott had not prior to designation for hearing in the instant proceeding made the statement or representation to the Commission that throughout the six-year effort to obtain his permit he maintained a good faith intention to operate KCVI as a commercial facility with a religious format (*see HDO* ¶ 3) or that throughout the comparative proceeding, he always intended to operate with a commercial religious format. (*see HDO* ¶ 9) [*sic*]

19. On July 20, 1993, the Bureau filed its response to the admission request. The Bureau submitted that portions of Bott's request were improper in that they asked the Bureau to admit to statements made or not made by Bott. Instead, the Bureau stated that it would admit to the truth of the following "revised" admission:

> The Bureau does not possess a copy of a written statement or transcript of an oral representation by Bott to the Commission in which Bott asserts that throughout the six-year effort to obtain his permit he maintained a good faith intention to operate KCVI as a commercial facility with a religious format or that throughout the comparative proceeding, he always intended to operate with a commercial religious format.

(Mass Media Bureau's Response to Request for Admission, filed on July 20, 1993; official notice taken.)

20. On July 20, 1993, a prehearing conference was held in this proceeding. (Tr. 1.) Among the matters discussed were Bott's Petition for Reconsideration (Tr. 4), Bott's Motion to Delete Issues (Tr. 5), Bott's Request for Admission and the Bureau's response (Tr. 6, 8, 10), Bott's Petition for Certification to Commission (Tr. 6), discovery (Tr. 16), the burden of proceeding and proof (Tr. 22), and summary decision (Tr. 16, 26). With respect to the latter, Bureau counsel raised the possibility of the filing of a motion for summary decision by Bott after the completion of discovery (Tr. 16), or premised on the Bureau's response to the Request for Admission (Tr. 26), and counsel for Bott recognized that he had such an option (*id.*).

21. By *Order*, FCC 93M-533, released August 17, 1993, the Presiding Judge deferred rulings on Bott's Motion to Delete Issues and Petition for Certification to Commission, pending action by the Commission on Bott's Petition for Leave to File Petition for Reconsideration and Petition for Reconsideration. This action was taken because the pleadings addressed to the Presiding Judge (*i.e.*, the Motion to Delete and the Petition for Certification) requested essentially the same relief as those addressed to the Commission (*i.e.*, the Petition for Leave to File and the Petition for Reconsideration). (*See also* Tr. 7-10.)

22. On August 18, 1993, Bott filed a Request for Dismissal of "Petition for Leave to File Petition for Reconsideration" and "Petition for Reconsideration," which was addressed to the Commission. (Official notice taken.) Bott requested the "immediate dismissal" of those two pleadings. Bott stated that he took this action in response to the Presiding Judge's August 17 *Order* because of Bott's "desire to have the Presiding Judge act on those pleadings pending before him."

23. By *Order*, 8 FCC Rcd 7303, released October 8, 1993, the Commission, *inter alia*, granted Bott's Request for Dismissal, and dismissed the Petition for Leave to File Petition for Reconsideration and the Petition for Reconsideration.

24. By *Memorandum Opinion and Order*, FCC 93M-643, released October 8, 1993, the Presiding Judge denied Bott's Motion to Delete Issues and his Petition for Certification to Commission. With regard to the motion to delete, it was determined that Commission precedent precluded the Presiding Judge from substituting his judgment for that of the Commission, and that the Presiding Judge lacked the authority to review the propriety of the designation of a case for hearing or to issue a ruling which would have the

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pledges, such as being contingent on the practicality of introducing a commercial religious or any other particular format" (*id.* at para. 9); and (c) "Bott has represented in the instant proceeding that, throughout the comparative proceeding, he always intended to operate with a commercial religious format . . ." (*id.*). With respect to (a) and (c), Bott claimed that he did not make the statements attributed to him, and that his format decision was made after the CP grant was affirmed by the Court of Appeals in 1991. With respect to (b), Bott maintained that he testified during the comparative hearing that he had not made a format decision. (Petition for Reconsideration at pp. 2-5.)

effect of dismissing a hearing designation order as defective. In denying the petition for certification, the *Memorandum Opinion and Order* stated:

> As a practical matter, Bott's petition for certification is an attempt, through the authority of the Presiding Judge, to have the Commission review and reconsider the *HDO* in this proceeding. However, Bott had pending before the Commission itself a Petition for Leave to File Petition for Reconsideration and an accompanying Petition for Reconsideration of the *HDO*. Those pleadings raised directly before the Commission the identical questions that Bott is now seeking to have the Presiding Judge certify to the Commission. Despite this, Bott voluntarily chose to dismiss his Petition for Leave to File and his Petition for Reconsideration without awaiting Commission action on the merits of his arguments. In other words, Bott willfully and purposely withdrew from the Commission the opportunity to review and reconsider the *HDO* in light of his contentions. Yet, at the same time, Bott is maintaining that the Presiding Judge should give the Commission the opportunity to do the same. These positions appear to be completely inconsistent and, given the circumstances, it would not be appropriate to allow Bott to accomplish through indirect means that which he no longer desires or is willing to attempt to do by direct means.

The Hearing in this Proceeding and the Summary Decision

25. The hearing in this proceeding was held in Washington, D.C., on October 26, 1993. (Tr. 37.) Richard Bott, II, was the only witness to appear and testify. (Tr. 38, 75 *et seq.)* The record was initially closed at the end of the hearing. (Tr. 193; *Order*, FCC 93M-683, released October 28, 1993.) However, by *Order*, FCC 93M-700, released November 10, 1993, the record was reopened for the receipt of an additional exhibit, and was then reclosed.

26. By *Order*, FCC 93M-686, released October 29, 1993, Bott was given permission to file a post-hearing motion for summary decision. Bott filed such a motion on December 6, 1993, and the Bureau filed comments in support thereof on December 9, 1993. (Motion for Summary Decision, filed on December 6, 1993, by Bott; Mass Media Bureau's Comments in Support of Motion for Summary Decision, filed on December 9, 1993; official notice taken.)

27. By *Summary Decision*, 9 FCC Rcd 514, released January 28, 1994, all of the issues in this proceeding were resolved in Bott's favor, and the application for assignment of the CP was granted. The *Summary Decision* concluded, *inter alia*, that Bott did not misrepresent facts or lack candor either in connection with the integration pledge he made during the course of the Blackfoot, Idaho, comparative proceeding, or in the Opposition to Petition to Deny he filed in this proceeding. With respect to the statements Bott was alleged to have made in his Opposition, the *Summary Decision* stated:

> Turning first to the statements Bott is alleged to have made in his Opposition to Petition to Deny, the record establishes that those statements were not made by Bott. Specifically, the *HDO* attributed to Bott the statement that "throughout the six-year effort to obtain his permit he maintained a good faith intention to *both* move to Blackfoot *and operate KCVI as a commercial facility with a religious format.*" (Emphasis added.) The *HDO* also attributed to Bott the representation that "throughout the comparative proceeding, *he always intended to operate with a commercial religious format . . .*" (Emphasis added.) However, the italicized statements were not made by Bott in his Opposition, or anywhere else. On the contrary, the statements in question appear to have been derived from the "Summary" and "Background" portions of RRI's Reply to Opposition to Petition to Deny, which contained grossly inaccurate characterizations of Bott's actual statements.

(*Summary Decision* at para. 35.) In connection with the format of the proposed station, it was concluded that "there is no record evidence that the format decision was made prior to the summer of 1991, or that Bott's testimony in the Blackfoot comparative proceeding was untruthful." (*Id.* at para. 37.)

28. With respect to the specific questions raised by the *HDO*, the *Summary Decision* stated:

> The *HDO*, at paragraph 10, posed the question of why, if Bott intended to proceed without having chosen a particular format, the format issue became so critical later. Bott has satisfactorily answered that question. Specifically, Bott chose the commercial religious format largely because of the depressed state of the economy and the downturn in the radio industry. This format relied primarily upon the sale of blocks of time and, for that reason, stood a greater chance of being economically viable in a depressed economy. The alternative formats he considered relied substantially upon spot advertising. In addition, after Bott became aware of KRSS's plans, he considered format alternatives but, faced with a start-up operation in a very depressed economy, he believed that he would not be financially successful operating a new radio station with a format relying heavily upon spot advertising.
>
> The *HDO*, at paragraph 11, also questioned Bott's conclusion that he could not compete with KRSS when Bott's proposed coverage area was greater than that of KRSS. Bott has credibly answered this question as well. Thus, Bott knew, from the time he first learned about KRSS in September 1991, that the station was planning to increase power from a mountaintop site. Based upon his knowledge of broadcast engineering concepts generally, and his prior experience with a mountaintop site, Bott believed that KRSS's signal would serve substantially the same market that he was targeting. (Bott's belief was ultimately shown to be correct.) Moreover, KRSS was in a position to be on the air before Bott's Blackfoot station, and planned to broadcast many of the same programs Bott had intended to use, rendering them unavailable to his station. Even if Bott had sold time to competitive programs, the audience would have been split. Consequently, given the size and demographics of the market, Bott did not believe he could sustain a financially viable operation even with greater coverage.

(*Summary Decision* at paras. 40-41.)

CONCLUSIONS OF LAW

29. This proceeding involves the application of Bott for an award of attorney's fees and expenses pursuant to the EAJA. For the reasons which follow, it is concluded that the EAJA does not apply to this proceeding. Moreover, even assuming the applicability of the EAJA, it is also concluded that Bott's application must be denied.

30. Section 1.1501 of the Commission's Rules, which implements the EAJA, provides for the award of attorney's fees and other expenses to an eligible party "when it prevails over the Commission, unless the Commission's position in the proceeding was substantially justified or special circumstances make an award unjust." Similarly, Section 1.1505(a) of the Rules, entitled "Standards for awards," states, in pertinent part:

> A prevailing applicant may receive an award for fees and expenses incurred in connection either with a proceeding, or with a significant and discrete substantive portion of a proceeding, unless the Administrative Law Judge determines that the position of the Commission over which the applicant has prevailed was substantially justified. The position of the Commission includes . . . the action . . . by the agency upon which the adversary adjudication is based.

In addition, Section 1.1526(a) of the Rules provides, in part, that "[w]hether or not the position of the agency was substantially justified shall be determined on the basis of the administrative record, as a whole, which [was] made in the adversary adjudication for which fees and other expenses are sought."

31. As a preliminary matter, Bott argues that the EAJA is applicable to this case because it is an adversary adjudication within the meaning of the rules. (Application for Award at pp. 1-3.) The Bureau, on the other hand, claims that this is not the type of proceeding to which the EAJA applies because it involves an application for assignment of license, which does not fall within the definition of an adversary adjudication. (Answer at pp. 1-4.)

32. It must be concluded that the EAJA is not applicable to this proceeding. Section 1.1503(a) of the Rules defines "adversary adjudications" as those conducted under a certain section of the Administrative Procedure Act in which the position of the Commission, or any component thereof, is presented by an attorney who enters an appearance and participates in the proceeding. Proceedings to grant or renew licenses are expressly excluded from the definition of adversary adjudications, while proceedings to modify, suspend, or revoke licenses are expressly included. Clearly, the position of the Bureau, a component of the Commission, was presented by attorneys who appeared and participated in this case. However, this case did not involve the modification, suspension or revocation of Bott's CP, proceedings which are expressly included in the definition of adversary adjudications. Instead, this case concerned the assignment of Bott's CP to Western, which is manifestly a licensing proceeding. Such proceedings are specifically excluded from the EAJA.

33. In this connection, Bott argues that he faced a large forfeiture and a possible judgment that he was not fit to be a Commission permittee. (Application for Award at p. 3.) However, identical questions and sanctions typically arise in comparative proceedings involving misrepresentation and lack of candor issues, but these are licensing proceedings excluded from the EAJA. Therefore, standing alone, the type of sanction which may be imposed is not determinative. Further, the *HDO* made specific provision for the transformation of this case into a revocation proceeding should certain circumstances take place.[3] Since such circumstances did not come to pass, this case remained a licensing proceeding. In any event, even assuming, *arguendo*, that the EAJA is applicable to this proceeding, the findings of fact establish, and it is concluded, that the Commission's position was substantially justified and an award of attorney's fees and other expenses is not warranted.

34. The major premise underlying Bott's application for an award of fees and expenses is his contention that the Commission's actions in designating the assignment application for hearing and in going forward with the hearing were not substantially justified. This is so, Bott contends, because the Commission had no evidence that he ever contradicted the testimony he gave during the comparative proceeding. (Application for Award at pp. 4, 6.) In support, Bott relies on the portion of the *Summary Decision* which concluded that certain statements imputed to him in the *HDO* were derived from "grossly inaccurate characterizations" contained in RRI's Reply to Opposition to Petition to Deny. (*Id.* at pp. 4-5, 7; *see also* para. 27, *supra.*) Bott claims that the basis for the misrepresentation/lack of candor issue, and thus the designation of this case for hearing, "rested *entirely* upon the Commission's unquestioning acceptance of RRI's grossly inaccurate characterizations' of Bott's statements to the Commission." (*Id.* at pp. 5-6; emphasis added.) Bott also argues that even if the Commission made an innocent error in misreading RRI's allegations, "innocent error is not substantial justification." (Response to Answer at p. 7.) Bott further relies for support on the Bureau's admission that it did not possess a copy of a written statement or a transcript of any oral representation by Bott containing the statements attributed to him in the *HDO*. (Application for Award at pp. 5-6; *see also* paras. 18-19, *supra.*) Based upon these arguments, Bott maintains that the Commission's designation of this case for hearing "had no reasonable basis in law or fact" and that "a reasonable person making an independent reading of Bott's statements could not have concluded that there was any substantial reason to believe that Bott had made misrepresentations or had lacked candor." (*Id.* at p. 7.)

35. Bott's premise is misplaced. While there can be no question that Bott did not make the statements ascribed to him in the *HDO*, it cannot be concluded, as urged by Bott, that the inaccurate attribution constituted the *entire* basis for the designation of this case for hearing. On the contrary, the findings establish, and it is concluded, that there were ample other grounds for setting this case for hearing.

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[3] One of those circumstances involved a final determination that Bott was not qualified to remain a permittee. Had such a final determination been made, an order to show cause looking towards the revocation of Bott's CP would have been issued. At that time, this case would have become a revocation proceeding, and the EAJA would have applied.

36. First, Bott obtained his CP in the comparative proceeding only because of his integration commitment, and Bott repeatedly, unambiguously, and unconditionally testified in that case that he would move to Blackfoot to fulfill that promise. Bott maintained this position through the Court of Appeals. Yet, a mere nine months after Bott was issued the CP, he filed an application to assign it to Western. Those circumstances, without more, served to place into question the candor of Bott's testimony with respect to his integration pledge in the comparative proceeding.

37. Second, Bott testified in the comparative proceeding that he had not selected the format for his proposed station. However, when the assignment application was challenged by RRI, Bott stated in his Opposition to Petition to Deny that he decided to assign his CP, in part, because another FM station in the market, KRSS, was planning to use a format very similar to the one Bott ultimately decided to use. This raised the question of why the format issue became so critical to Bott when his integration commitment was made without consideration of format. This also placed into question the candor of Bott's testimony with regard to format in the comparative hearing, and the representations he made in his Opposition.

38. Third, the Opposition also stated that KRSS would serve much the same market area as Bott's station was proposing to serve, and the market was too small to support two similarly formatted stations. But RRI, in its Reply to Opposition to Petition to Deny, argued that Bott's proposed station would serve a much larger area and population than would be served by station KRSS, supported that assertion with a lengthy engineering study which was not challenged by Bott, and alleged that Bott's claims of competitive disadvantage were false. This, too, placed into question the candor of Bott's Opposition, as well as the credibility of his rationale for assigning rather than constructing his station.

39. Bott also argues that even if the Commission had been justified in designating this case for hearing, such justification "terminated" when it became clear that the alleged basis for the hearing did not exist. Bott implies that this point came when the Bureau filed its Response to Request for Admission. In addition, citing *Eagle 22, Ltd.*, 7 FCC Rcd 5295 (1992), Bott maintains that the Bureau knew that the law permitted his sale of the unbuilt CP at no profit without the need for him to justify his decision to sell. (Response to Answer at pp. 6-7.)

40. Bott's arguments are without merit. Although *Eagle 22* may permit the sale of an unbuilt CP without the seller providing a justification, the findings establish that Bott, in his Opposition to Petition to Deny, voluntarily provided to the Commission the reasons for his decision to assign the CP to Western. As demonstrated above, it was those very reasons which raised the misrepresentation/lack of candor questions leading to the designation of this case for hearing, and the Commission could hardly be expected to overlook the substantial and material questions raised by Bott's explanation. Therefore, the state of the Bureau's knowledge of *Eagle 22* is completely irrelevant. Further, the Bureau's Response to Request for Admission was not a concession that the alleged basis for the hearing did not exist. Rather, the Bureau only admitted that it did not have any documentation establishing that Bott made certain statements imputed to him in the *HDO*. There was no admission by the Bureau with respect to anything else and, as shown above, there were other grounds for setting this case for hearing.

ULTIMATE CONCLUSIONS

41. In sum, it must be concluded that the EAJA does not apply to this case because it is a licensing proceeding expressly excluded from the act. Moreover, even assuming the applicability of the EAJA, it must ultimately be concluded that the Commission's position in this proceeding was substantially justified. Thus, it is abundantly clear that there were, in fact, ample reasons for designating for hearing the Bott-Western assignment application and for specifying a misrepresentation/lack of candor issue against Bott. These reasons were completely independent of the "grossly inaccurate characterizations" contained in RRI's Reply and repeated in the *HDO*. Further, contrary to Bott's assertions, a reasonable person undertaking an independent analysis of Bott's statements could, indeed, have concluded that substantial and material questions of fact were raised as to whether Bott misrepresented facts or lacked candor either in his testimony in the comparative hearing or in his Opposition to Petition to Deny. Consequently, Bott's unidimensional, constricted, reading of the *HDO* is fatally flawed, and his application for an award of attorney's fees and other expenses must be denied.

Accordingly, IT IS ORDERED that, unless an appeal from this Initial Decision is taken by a party, or it is reviewed by the Commission on its own motion in accordance with Sections 1.276 and 1.1528 of the Rules, the Application for Award Pursuant to the Equal Access to Justice Act, filed by Bott on April 18, 1994, IS DENIED.[4]

FEDERAL COMMUNICATIONS COMMISSION

Arthur I. Steinberg
Administrative Law Judge

[4] In the event exceptions are not filed within 30 days after the release of this Initial Decision, and the Commission does not review the case on its own motion, this Initial Decision shall become effective 50 days after its public release pursuant to Sections 1.276(d) and 1.1528 of the Rules.

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

IAN, Inc. File No. ITC-94-084

For Authority, Pursuant to
Section 214 of the Communications
Act of 1934, As Amended, to Resell
Private Line Service Between
the United States and Canada

ORDER, AUTHORIZATION AND CERTIFICATE

Adopted: July 20, 1994; Released: August 5, 1994

By the Chief, International Facilities Division:

1. On December 16, 1993, IAN, Inc. ("IAN")[1] filed an application requesting authority pursuant to Section 214 of the Communications Act, as amended, to resell private lines for the purpose of providing private line and switched voice and data services.[2]

2. AT&T filed comments stating that it was unclear whether IAN was seeking authority to resell international private line and switched services to other international points in addition to Canada. AT&T states that if IAN is seeking such authority it has not demonstrated that U.S. carriers have equivalent resale opportunities as required by the *International Resale Order*.[3] In its reply, IAN stated that its application "requests only such authority as that currently permitted under Commission rules and policies."[4] Based on the foregoing, we conclude that IAN only requests authority under Section 214 of the Communications Act to resell international private line and switched services between the United States and Canada. We find, therefore, that the present and future public convenience and necessity require the resale of international private lines for the provision of international interconnected private line and switched services to the general public by IAN.

3. Accordingly, IT IS ORDERED that application file I-T-C-94-084 IS GRANTED and IAN is authorized to resell international private lines for the provision of private line and switched services[5] between the United States and Canada.[6]

4. IT IS FURTHER ORDERED that IAN is authorized to lease and operate a one-half interest in twenty-four 64-kpbs circuits between the United States and Canada, for the provision of its authorized international private line and switched services pursuant to the tariffs of authorized U.S. international carriers.[7]

5. IT IS FURTHER ORDERED that neither IAN nor any persons or companies directly or indirectly controlling it or controlled by it, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession contract, understanding, or working arrangement to which IAN or any such persons or companies controlling or controlled by IAN are parties.

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[1] IAN is a privately-held Delaware corporation. IAN is planning to provide international voice and data services, including International Data Rate service, over the private lines authorized for resale in this Order.

[2] The Commission has concluded that the public interest in cost-based international telecommunications services would be served by the encouragement of international resale, provided that steps were taken to ensure that such resale did not result in the unilateral diversion of U.S. inbound switched traffic to private lines, and thus, exacerbate the settlements deficit. The Commission, therefore, conditioned its resale policy by requiring U.S. carriers to permit resale of their international private lines only to those countries which afford equivalent resale opportunities. *See Regulation of International Accounting Rates*, CC Docket 90-337, Phase II, First Report and Order, 7 FCC Rcd 559 (1992) (*"International Resale Order"*). Subsequently, the Commission stated that the resale of international private lines for the provision of international private line services, as opposed to switched services, does not implicate the settlements process to the extent such lines are used only to carry non-switched traffic that is not subject to the international settlements process, and thus clarified that the equivalency requirement does not apply to the resale of international private lines for private line services. Nevertheless, the Commission confirmed the right of an end user to interconnect its international private lines to the public switched network, through, for example, its own private branch exchange. *See Regulation of International Accounting Rates*, CC Docket 90-337, Phase II Order on Reconsideration and Third Further Notice of Proposed Rulemaking, 7 FCC Rcd 7927 (1992) (*"Phase II Third Further Notice"*).

[3] *Regulation of International Common Carrier Services*, 7 FCC Rcd 559 (1991). *See* AT&T Comments, at 2.

[4] IAN Letter from Mitchell F. Brecher, Counsel for IAN, to William Caton, Acting Secretary, FCC, dated Feb. 15, 1994.

[5] In *fONOROLA Corporation and EMI Communications Corporation*, 7 FCC Rcd 7312 (1992), *petition for recon. pending*, the Commission determined that Canada affords resale opportunities equivalent to those available under U.S. law. Therefore, resale of international private lines for switched services and of interconnected international private lines for private line services between the United States and Canada is permitted subject to appropriate authorization.

[6] We note that should IAN obtain any interest in facilities beyond the authorized international point for providing common carrier services, including private line service between the United States and other international points, such action would constitute an extension of lines under Section 214 of the Communications Act. Therefore, under the provisions of the Commission's *International Competitive Carrier Policies*, 102 FCC 2d 812 (1985), *recon. denied* 60 R.R. 2d 1435 (1986), it would be necessary for IAN to file an additional application for a certificate of public convenience and necessity under Section 214 to begin service to each additional country and for authority to acquire any facilities needed to provide service to such additional points.

[7] IAN proposes to resell AT&T FCC Tariff Nos. 9 and 11, EMI FCC Tariff No. 14, fONOROLA FCC Tariff No. 1, MCI FCC Tariff Nos. 1 and 2, and Sprint FCC Tariff Nos. 2, 5 and 7.

6. IT IS FURTHER ORDERED that IAN shall file publicly tariff provisions pursuant to Section 203 of the Communications Act, 47 U.S.C. § 203, and Part 61 of the Commission's rules, 47 C.F.R. Part 61, for the services authorized herein.

7. IT IS FURTHER ORDERED that IAN shall file the annual reports of overseas telecommunications traffic required by Section 43.61 of the Commission's rules, 47 C.F.R. § 43.61.

8. IT IS FURTHER ORDERED that IAN shall file a copy of any operating agreements entered into with foreign correspondents with the Commission within 30 days of their execution, and shall otherwise comply with the filing requirements contained in Section 43.51 of the Commission's rules, 47 C.F.R. § 43.51.

9. IT IS FURTHER ORDERED that IAN shall file all arrangements for private line interconnection to the U.S. public switched network, pursuant to Section 43.51(a) of our Rules, 47 C.F.R. § 43.51(a).

10. IT IS FURTHER ORDERED that IAN shall file semi-annual reports of circuit additions, pursuant to Section 63.15(b) of the Commission's rules, 47 C.F.R. § 63.15(b).

11. IT IS FURTHER ORDERED that this Order may be subject to future modification pursuant to the outcome of the *Phase II Third Further Notice, fONOROLA/EMI Reconsideration* and any related proceedings.

12. IT IS FURTHER ORDERED that grant of this authorization is conditioned upon Canada's continuing to afford resale opportunities equivalent to those afforded under U.S. law.

13. IT IS FURTHER ORDERED that nothing in this authorization should be construed to include authorization for the transmission of money in connection with the services IAN seeks authority to provide. The transmission of money is not considered to be a common carrier service.

14. This Order is issued under Section 0.291 of the Commission's rules, and is effective upon adoption. Petitions for reconsideration under Section 1.106 and applications for review under Section 1.115 of the Commission's rules may be filed within 30 days of the public notice of this Order. (*See* 47 C.F.R. § 1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li
Chief, International Facilities Division
Common Carrier Bureau

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

MFS INTERNATIONAL, INC. File No. I-T-C-94-236

Application for Authority Pursuant to Section 214 of the Communications Act As Amended, to Provide Private Line and Switched Services Between the United States and Various International Points

ORDER, AUTHORIZATION AND CERTIFICATE

Adopted: July 28, 1994; Released: August 5, 1994

By the Chief, International Facilities Division:

1. Upon consideration of the above-captioned uncontested application filed pursuant to Section 214 of the Communications Act of 1934, as amended, IT IS HEREBY CERTIFIED that the present and future public convenience and necessity require the resale of international private lines for the provision of international private line services and resale of international switched services[1] to the general public by MFS International, Inc. ("MFS").[2]

2. Accordingly, IT IS ORDERED that application File No. I-T-C-94-236 IS GRANTED and MFS is authorized to resell international switched services pursuant to the tariffs of authorized carriers[3] between the United States and countries listed in Attachment A.[4]

3. IT IS FURTHER ORDERED that MFS is authorized to lease and operate up to two DS-3 circuits (1,344 64 kbps circuits) to each of the countries listed in Attachment A, from authorized carriers MCI Communications, Inc., AT&T Communications, Inc., IDB/WorldCom and US Sprint, at tariff, for the provision of private line services, not interconnected with the public switched network, as specified in this Order.[5]

4. IT IS FURTHER ORDERED that neither MFS nor any persons or companies directly or indirectly controlling it or controlled by it, or under direct or indirect common control with it, shall acquire or enjoy any right, for the purposes of handling or interchanging traffic to or from the United States, its territories or possessions, which is denied to any other United States carrier by reason of any concession contract, understanding or working arrangement to which MFS or any such persons or companies controlling or controlled by MFS are parties.

5. IT IS FURTHER ORDERED that MFS shall file publicly tariff provisions pursuant to Section 203 of the Communications Act, 47 U.S.C. §203, and Part 61 of the Commission's rules, 47 C.F.R. Part 61, for the services authorized herein.

6. IT IS FURTHER ORDERED that MFS shall file the annual reports of overseas telecommunications traffic required by Section 43.61 of the Commission's rules, 47 C.F.R. §43.61.

7. IT IS FURTHER ORDERED that MFS shall file a copy of any operating agreement entered into with foreign corespondent with the Commission within 30 days of their execution, and shall otherwise comply with the filing requirements contained in Section 43.51 of the Commission's rules, 47 C.F.R. §43.51.

8. IT IS FURTHER ORDERED that MFS shall file semi-annual reports of circuit additions, for each certified point, pursuant to Section 63.15(b) of the Commission's rules, 47 C.F.R. §63.15(b), for the provision of private line services.

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[1] The Commission has concluded that the public interest in cost-based international telecommunications services would be served by the encouragement of international resale, provided that steps were taken to ensure that such resale did not exacerbate the settlements deficit. The Commission, therefore, conditioned its resale policy by requiring U.S. carriers to permit resale of their international private lines only to those countries which afford equivalent resale opportunities. *See Regulation of International Accounting Rates, CC Docket 90-337, Phase II Report and Order,* 7 FCC Rcd 559 (1992). Subsequently, the Commission stated that the resale of international private lines for the provision of international private line services, as opposed to switched services, does not implicate the settlements process to the extent such lines are used only to carry non-switched traffic that is not subject to the international settlements process, and thus clarified that the equivalency requirement does not apply to the resale of international private lines for private line services. Nevertheless, the Commission confirmed the right of an end user to interconnect its international private lines to the public switched network, through, for example, its own private branch exchange. *See Regulation of International Accounting Rates, CC Docket 90-337, Phase II Order on Reconsideration and Third Further Notice of Proposed Rulemaking,* 7 FCC Rcd 7927 (1992) (*"Phase II Third Further Notice"*).

[2] MFS is a Delaware corporation that is a wholly-owned subsidiary of MFS Communications Company, Inc.

[3] MFS intends to resell the following carriers and their tariffs: AT&T FCC Tariff Nos. 1 and 2; MCI FCC Tariff No. 1; US Sprint FCC Tariff Nos. 1 and 2; C&W FCC Tariff No. 3; Litel FCC Tariff No. 1; LDDS FCC Tariff No. 1; IDB/Worldcom FCC Tariff No. 1; and Wiltel FCC Tariff No. 1.

[4] We note that should MFS obtain any interest in facilities beyond the authorized international point for providing common carrier services, including private line service between the United States and other international points, such action would constitute an extension of lines under Section 214 of the Communications Act. Therefore, under the provisions of the Commission's *International Competitive Carrier Policies,* 102 FCC 2d 812 (1985), *recon. denied,* 60 R.R. 2d 1435 (1986), it would be necessary for MFS to file an additional application for a certificate of public convenience and necessity under Section 214 to begin service to each additional country and for authority to acquire any facilities needed to provide service to such additional points.

[5] MFS proposes to provide voice, data and video communications services.

9. IT IS FURTHER ORDERED that this Order may be subject to future modification pursuant to the outcome of the *Phase II Third Further Notice* and any related proceedings.

10. IT IS FURTHER ORDERED that nothing in this authorization should be construed to include authorization for the transmission of money in connection with the services MFS seeks authority to provide. The transmission of money is not considered to be a common carrier service.

11. IT IS FURTHER ORDERED that our authorization of MFS to provide private lines is limited to the provision of such private lines only between the United States and those countries listed in Attachment A -- that is, private lines which originate in the United States and terminate in one of the countries listed in Attachment A, or which originate in one of the countries listed in Attachment A and terminate in the United States. In addition, MFS may not -- and MFS's tariff must state that its customers may not -- connect private lines provided over these facilities to the public switched network at either the U.S. or foreign end, or both, for the provision of international basic communications services, including switched voice services, unless authorized to do so by the Commission upon a finding that the foreign administration affords resale opportunities equivalent to those available under U.S. law, in accordance with *Regulation of International Accounting Rates, Phase II, First Report and Order*, 7 FCC Rcd 559 (1991), and *Order on Reconsideration and Third Further Notice of Proposed Rulemaking*, 7 FCC Rcd 7927 (1992), *petition for reconsideration pending*.

12. This Order is issued under Section 0.291 of the Commission's rules, and is effective upon adoption. Petitions for reconsideration under Section 1.106 of applications for review under Section 1.115 of the Commission's rules may be filed within 30 days of the public notice of this Order. (*See* 47 C.F.R. §1.4(b)(2)).

FEDERAL COMMUNICATIONS COMMISSION

George S. Li
Chief, International Facilities Division
Common Carrier Bureau

ATTACHMENT A

Countries For Which Section 214 Authority Is Requested

Country	No. of Circuits
Argentina	2 DS-3s
Austria	2 DS-3s
Australia	2 DS-3s
Bahamas	2 DS-3s
Belgium	2 DS-3s
Bermuda	2 DS-3s
Brazil	2 DS-3s
Canada	2 DS-3s
Chile	2 DS-3s
China, People's Republic	2 DS-3s
Commonwealth of Independent States (including the countries formerly comprising the Union of Soviet Socialist Republics)	
Denmark	2 DS-3s
Egypt	2 DS-3s
Ecuador	2 DS-3s
France	2 DS-3s
Germany	2 DS-3s
Ghana	2 DS-3s
Greece	2 DS-3s
Hong Kong	2 DS-3s
India	2 DS-3s
Indonesia	2 DS-3s
Ireland	2 DS-3s
Israel	2 DS-3s
Italy	2 DS-3s
Japan	2 DS-3s
Kenya	2 DS-3s
Korea	2 DS-3s
Liechtenstein	2 DS-3s
Mexico	2 DS-3s
Netherlands	2 DS-3s
New Zealand	2 DS-3s
Norway	2 DS-3s
Panama	2 DS-3s

Country	No. of Voice Grade Circuits
Peru	2 DS-3s
Philippines	2 DS-3s
Poland	2 DS-3s
Portugal	2 DS-3s
Romania	2 DS-3s
Saudi Arabia	2 DS-3s
Singapore	2 DS-3s
South Africa	2 DS-3s
Spain	2 DS-3s
Sweden	2 DS-3s
Switzerland	2 DS-3s
Thailand	2 DS-3s
Taiwan	2 DS-3s
United Kingdom	2 DS-3s
Venezuela	2 DS-3s
Yugoslavia	2 DS-3s
Zaire	2 DS-3s

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of the Application of

NEW JERSEY BELL TELEPHONE COMPANY — File No. W-P-C-6840

For Authority pursuant to Section 214 of the Communications Act of 1934, as amended, to construct, operate, own, and maintain advanced fiber optic facilities and equipment to provide video dialtone service within a geographically defined area in Dover Township, Ocean County, New Jersey

ORDER AND AUTHORIZATION

Adopted: July 5, 1994; Released: July 18, 1994

By the Commission: Commissioners Barrett and Ness issuing separate statements.

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I. INTRODUCTION

1. In the captioned application, the New Jersey Bell Telephone Company (NJB) proposes to provide video dialtone service in a part of its service area.[1] This application represents one of the first two filings for the provision of commercial video dialtone service.[2] We here grant the application subject to conditions that will help protect against improper cross-subsidy and discrimination by NJB.[3] We find that the proposed system will promote the "public convenience and necessity"[4] in Dover Township, in part by stimulating investment in telecommunications infrastructure, providing competition in the video marketplace, and fostering a diversity of information sources in order to expand consumer choice.

2. In the *VDT Order*, the Commission determined that, through video dialtone, local telephone companies could participate in the video marketplace, consistent with the statutory telephone company-cable television cross-ownership restrictions.[5] We defined "video dialtone" as the provision by a local telephone company of a basic common carrier platform to multiple video programmers on a nondiscriminatory basis. A "basic platform" is a common carriage transmission service coupled with the means by which end-user subscribers can access any or all video programming. If a local telephone company provides such a basic platform, it is permitted to provide enhanced and non-common carrier services related to the provision of video programming in addition to basic common carrier

[1] The application was filed pursuant to § 214 of the Communications Act of 1934, as amended, and § 63.54 of the Commission's rules, for services in the municipality of Dover Township, Ocean County, New Jersey (W-P-C 6840, FCC Public Notice Rept. No. D-675-A, December 23, 1992)(Application). "NJB" refers to New Jersey Bell as well as to the name New Jersey Bell adopted during the course of this proceeding, Bell Atlantic - New Jersey.

[2] The Commission has approved five applications for video dialtone trials: *C&P of Virginia*, 8 FCC Rcd 2313 (1993)(*C&P Trial); New York Telephone*, 8 FCC Rcd 4325 (1993)(*NYT Trial); Southern New England Telephone*, 9 FCC Rcd 1019 (1993)(*SNET Trial); US West Communications, Inc*, 9 FCC Rcd 184 (1993)(*USWest Trial);* and *Rochester Telephone Company*, 9 FCC Rcd 2285 (1994)(*Rochester Trial*).

[3] We state the specific conditions below in Section VI.

[4] 47 U.S.C. § 214(a).

[5] The Commission adopted video dialtone policies in Telephone Company-Cable Television Cross-Ownership Rules, Sections 63.54-63.58, Second Report and Order, Recommendation to Congress, and Second Further Notice of Proposed Rulemaking, 7 FCC Rcd 5781, at 5783 (1992), *pets. for recon. pending, appeal pending sub nom., Mankato Citizens Telephone Company v. FCC*, No. 92-1404 (D.C. Cir. Sept. 9, 1992) (*VDT Order*). *See also, NYT Trial* at note 3.

services.[6] The Commission also determined that carriers must receive Commission authorization under Section 214 before constructing video dialtone facilities.[7]

II. THE APPLICATION

3. On December 15, 1992, NJB filed a Section 214 application to provide video dialtone service in Dover, New Jersey (Application). The service will pass 38,000 homes, 35% of which NJB predicts will become end-user subscribers.[8] Seven parties filed petitions to deny, one party filed a letter of opposition, and two parties filed a request for consumer safeguards.[9] On April 22, 1993, the Commission staff asked NJB to respond to questions regarding its Section 214 application, to which NJB responded on April 30, 1993 (NJB Answers). Adelphia filed comments on the NJB Answers. On July 28, 1993, the Commission sent a letter to NJB finding that the application did not contain the level of specificity necessary for decision and noting that the application appeared inconsistent with video dialtone requirements for a basic common carrier platform able to serve a multiplicity of video programmers. NJB was given forty-five days to amend its application, or to submit a new application.[10] On September 2, 1993, NJB amended its application.[11] Seven parties filed comments or responses on the Amended Application. The record closed on October 12, 1993.

4. NJB states that the system will offer tariffed video dialtone service using a fiber-to-the-curb architecture, with coaxial cables and copper wire for the final link to the home.[12] NJB states that it will replace the copper-based facilities between its central offices and the curb with fiber optic cable over which it will provide, on an integrated basis, video dialtone, telephone exchange, and exchange access service. More specifically, NJB's application is for the following facilities and equipment: (1) installation of coaxial cable from the curb-side Optical Network Unit (ONU) to the home;[13] (2) installation of fiber optic cables between New Jersey Bell's central offices where needed to transmit video signals; (3) where requested by a programmer-customer, installation of fiber optic facilities from that customer's head-end to New Jersey Bell's nearest central office; (4) installation of signal processing or other equipment at New Jersey Bell's central offices and on New Jersey Bell's side of the network demarcation points; and (5) installation of other equipment, such as pedestal-mounted electronics, connectors, and power supplies needed to operate the proposed system.[14] NJB states that it is already committed under the "Opportunity New Jersey" plan approved by the New Jersey Board of Regulatory Commissioners (New Jersey Board) to accelerating deployment of advanced technologies to achieve full broadband capability by 2010.[15]

5. The network will transmit digital voice, data, and video signals over the same fiber cable.[16] NJB states that it plans to offer, as part of its video dialtone service, both a regulated video dialtone platform consisting of common carrier transport along with a regulated entry-level gateway, and non-common carrier services, including an unregulated second-level gateway, ancillary services such as set-top converters or other video customer premises equipment (CPE),[17] and inside wiring.[18] Initially, according to

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[6] *VDT Order*, 7 FCC Rcd at 5783.

[7] *VDT Order* at 5820. Generally, Section 214 requires Commission authorization before a carrier extends a new interstate line of communication.47 U.S.C. § 214(a).

[8] NJB Opposition, Weber Decl. at ¶ ¶ 5, 7.

[9] See the Appendix for a list of the pleadings filed in this proceeding.

[10] *See* letter from William F. Caton, Acting Secretary, Federal Communication Commission, to New Jersey Bell Telephone Company, FCC 93-367, released July 28, 1993, ("FCC Letter").

[11] *See* Amendment and Clarification to Application (Amended Application), filed by NJB on September 2, 1993. (FCC Public Notice on the Amended Application was released September 3, 1993.)

[12] NJB will transmit video over coaxial cable and voice and data over copper wire.

[13] NJB states that the fiber links between the central office and the ONU are part of common facilities, not required solely for video dialtone, and therefore not part of this application. *See* Section III, B., 1. *infra*.

[14] Application at 6, Exhibit 1; Amended Application at 5, Exhibit 3.

[15] *See* NJB Opposition at 13.

[16] Application at 3.

[17] Our action here does not, of course, affect ongoing proceedings regarding possible restrictions and requirements to be placed on certain video-related CPE. *See* In the Matter of Implementation of the Cable Television Consumer Protection and Competition Act of 1992; Compatibility Between Cable Systems and Consumer Electronics, First Report and Order, ET Docket No. 93-7, FCC 94-80 (released May 4, 1994)(*Compatibility Order*). The *Compatibility Order* applies to only cable analog equipment, such as set-top boxes, and does not extend to digital or telephony equipment. *Compatibility Order* at ¶ ¶ 1, 143-147.

[18] Application at 3, 6-8. According to NJB, the basic regulated entry gateway is an on-screen menu through which end- users gain access to all programmers and programming. NJB states that this gateway, or platform, does not distinguish between switched and unswitched programming, nor does the format discriminate among programmers. Subscribers will use this gateway to select a programming source, and the system will establish the necessary link to the selected programmer's content. The end-user will use a remote channel selector to select programming. Depending on the programming selected, the selection technology will be either switched or unswitched. For switched programming, the end-user's selection signal will be transmitted to a Host Digital Terminal (HDT) in the central office, which will then select the appropriate programming port. For unswitched programming, the customer's electronic signal will cause the television to select the appropriate channel among dedicated channels that are continuously transmitted to the television. The NJB platform will, at all stages, be entirely in a digital format. No analog transmissions are contemplated. Analog programming will be converted to a digital format and transmitted to the end-user subscriber, where the programming will be reconverted to analog for viewing on the end-user's equipment. The system will begin with 64 digital channels. As of September, 1994, compression software will be available that will enable the same transmission capacity to be expanded to 384 channels. A "channel" is defined as one full-motion video transmission path. Initially the "menu" of programming will list each channel and the programming each channel carries. When the system capacity expands to 384 channels, the first-level gateway will be able to list service providers alphabetically. Subscribers will reach second-level gateways through the first level. Second-level gateways can be provided by any video server operator, including NJB. Second-level gateway providers may offer program menus sponsored by individual programmers. They also may offer additional services, including, but not limited to, more sophisticated menus and easy access to on-demand services. NJB Answers at 4, 7.

NJB, it will deliver multicast and narrowcast services,[19] with the capability in the future of delivering movies and other video programs to customers on demand.[20] With its application, NJB filed an illustrative tariff containing the proposed charges and regulations for the services to be offered. Under the tariff, NJB proposes to charge only the programmer-customer, not the end-user subscriber. The illustrative tariff would require the programmer-customer to pay the subscriber connection fee.[21]

6. NJB has an agreement with FutureVision of America, Corp. (FutureVision) under which FutureVision will be a video programmer-customer on NJB's video dialtone platform.[22] NJB states that the initial capacity of the system will be 64 digital channels. Upon installation of the software upgrade after its availability in September of 1994, however, the system will have a minimum of 384 channels of digital capacity. In its amended application, NJB states that as long as the capacity of the system remains limited to 64 channels, no one programmer-customer may purchase more than half of this initial capacity.[23]

7. NJB states that it will account for the investment and expenses associated with the proposed facilities in accordance with Parts 32 and 64 of the Commission's rules.[24] According to NJB, preliminary cost and separations studies suggest that approximately 40%-50% of the costs of the system will be assigned to video dialtone services, thus helping to ensure that the costs of providing video dialtone service are not borne by customers of other common carrier services.[25] NJB states that, if it receives Section 214 approval, the allocation of costs for ratemaking purposes will be addressed in more detail at the tariff review stage, and that it will submit a tariff that includes cost justification appropriate for a new service.[26]

III. DISCUSSION

8. Before us is an application under Section 214 for a commercial video dialtone service offering. To be granted, the application must satisfy the requirements of both our video dialtone rules and Section 214 of the Communications Act. Petitioners contend that the application satisfies neither. We consider first the contentions that this application does not satisfy our video dialtone requirements, and then turn to the issues raised under Section 214.[27]

A. Video Dialtone Issues

1. Overview

9. To qualify as video dialtone, a service must meet the requirements set forth in our *VDT Order*. Among other things, the service must include a "basic common carrier platform [available] to multiple video programmers on a nondiscriminatory basis," and a "means by which [end-user] customers can access any and all of the video programming" offered.[28] The platform must provide "sufficient capacity to serve multiple video programmers."[29]

10. In the instant application, the system proposed by NJB does feature the "basic platform" required by our *VDT Order*.[30] End-user subscribers have access to all of the video programming offered on the system. For the reasons set forth below, we conclude that NJB's application meets the requirements of nondiscrimination and adequate capacity.

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[19] NJB describes three basic forms of video dialtone transmission: multicast, in which all programming is technologically available (although perhaps in a secured form) to all end-users; narrowcast, in which selected programming goes to a selected subset of end-users, generally a geographical subset; and pointcast, in which selected programming goes to a selected end-user. Pointcast is used for "on-demand" services. NJB Answers at 3, Answer A6.

[20] NJB Applications at 6. NJB's architecture will permit a narrowcast signal to a geographic cell size of a minimum of approximately 250 end-user subscribers. See Application, Exhibit 5, Illustrative Tariff, § 18.4.2. The cell size is determined by the capacity of the HDT. This capability will allow a programmer to target programming to a small geographic community by offering particular programming options to individual neighborhoods. According to NJB, the system will initially provide sufficient interactivity to allow subscribers to make *a la carte* selections of certain programming options. In September of 1994, software revisions will be available that permit the delivery of on-demand services. NJB Answers at 3.

[21] Application, Exhibit 5, §§ 18.2.1, 18.2.7, 18.5. These proposed tariff provisions will be evaluated during the tariff review process.

[22] Application at 2.

[23] *Id.* According to NJB, FutureVision retains the right to use 60 channels on the system after installation of the software that will increase capacity to 384 channels. Amended Application at 2.

[24] *Id.* at 9.

[25] Amended Application at 12.

[26] *Id.*

[27] The U.S. District Court for the Eastern District of Virginia recently declared unconstitutional the statutory telephone company-cable television cross-ownership restriction codified at 47 U.S.C. § 533(b), and has applied that decision to all telephone companies owned by Bell Atlantic Corporation, including NJB. *Chesapeake and Potomac Tel. Co. of Va. v. FCC*, 123 F. Supp. 456 (E.D. Va. 1993), *appeal pending sub nom. United States v. Bell Atlantic Co.*, (4th Cir. Filed Feb. 1, 1994), *held in abeyance pending legislative action*. See also, *U S West, Inc., et al. v. United States*, No. C93-1523R (W.D. Wash, June 15, 1994). NJB's application does not contemplate that NJB or an affiliate will directly provide video programming to subscribers in these service areas. Rather, NJB proposes in this application to provide only video dialtone service, as well as unregulated non-common carrier services. We consider this application under our video dialtone rules, and do not address any of the regulatory issues raised by the possible provision by NJB of video programming directly to end-users over this video dialtone platform. We therefore condition this authorization on NJB and its affiliates not directly providing video programming on this video dialtone system.

[28] *VDT Order* at ¶ 2 & n.3.

[29] *VDT Order* at ¶ 29. The platform also must be expandable, pursuant to the Commission's requirement that "the platform must have the ability... to expand as demand increases so as not to become a bottleneck that will thwart realization of our public interest goals." *VDT Order*, at ¶ 30. Adequate capacity also is tied to other critical goals of video dialtone, such as "infrastructure development, increased competition in the delivery of video services, and the fostering of a diversity of video services to promote consumer choice." FCC Letter, p. 2.

[30] A "basic platform" is "a common carriage transmission service coupled with the means by which consumers can access any or all video program providers making use of the platform." *VDT Order* at note 3.

2. Sufficient Capacity and Nondiscriminatory Access By Video Programmers

a. Comments

11. NCTA contends that NJB's application does not qualify as video dialtone because NJB does not meet the requirement of providing a common carrier platform with sufficient capacity to serve multiple video programmers on a non-discriminatory basis.[31] In addition, NJCTA contends that, even if NJB retains no control over actual programming, NJB has violated a principle of video dialtone by choosing an initial programmer.[32] According to NCTA, the nature of NJB's alleged invitation to "all the cable operators in New Jersey to use the network" is unclear. NCTA claims that there is no evidence such an invitation was issued to use NJB's network in Dover.[33] Video dialtone, says NCTA, "is supposed to be 'open house,' not a private dinner for two."[34]

12. NJB responds that it has the ability to provide capacity to multiple video programmers and to expand capacity as demand increases.[35] NJB argues that, even with its agreement with FutureVision, the remaining initial capacity will be available for other programmers' use on a non-discriminatory, common carrier basis.[36] Moreover, NJB states, upon completion of construction, NJB's platform will have a capacity of 384 channels.[37] NJB contends that the Commission expressly rejected a minimum capacity requirement for video dialtone, and that NJB's platform satisfies the standard that the Commission adopted.[38] In addition, according to NJB, FutureVision was not privately preselected; rather, all the cable operators in New Jersey were invited to use its platforms.[39] FutureVision is one of the few who responded, and one of only two multichannel providers that have agreed to use NJB's platforms to date.

b. Discussion

13. A video dialtone service must offer nondiscriminatory access to multiple programmers, and its capacity must be able to expand to accommodate increasing demand so as not to become a bottleneck.[40] In *SNET Trial* we stated that in applying the capacity requirement we would review each application on a case-by-case basis taking into consideration: (1) the initial capacity available; (2) the ability to expand this capacity; and (3) the demand for capacity.[41]

14. For the following reasons, we conclude that NJB's proposed platform will offer capacity sufficient to satisfy the requirements of the *VDT Order*. Most importantly, NJB represents to us that the system will have a 384-channel capacity by year-end 1994. This is a capacity significantly greater than existing standard commercial cable systems, and none of the parties opposing grant of the application argues that 384 channels will not accommodate foreseeable demand. We find it unlikely based on this record that actual demand will exceed significantly the projected demand in the record and thus threaten to outstrip NJB's 384-channel system. Several commenters do challenge as overly optimistic NJB's plan to expand the initial 64 channels to 384 channels by late 1994.[42] NJB states, however, that the necessary software will be available for installation in September 1994. We require, as a condition of this authorization that any video dialtone service offered in Dover Township through January 3, 1995, must have at least 64 channels, and that after January 3, 1995 any such service must have a capacity of at least 384 channels.[43] This approach is consistent with NJB's representations in its application, and expressly incorporates NJB's representations into the conditional authorization.

15. We also conclude that NJB's proposed 64-channel platform will provide sufficient capacity to serve multiple video programmers in Dover Township during the short transitional period before January 3, 1995. NJB states that there currently remain 32 channels available to accommodate programmers other than FutureVision.[44] We find that NJB's commitment to upgrade to 384 channels to be an adequate and timely response if demand unexpectedly rises.[45] Thus, given the extremely short time period before NJB will expand its capacity and the relative lack of current demand during this transitional period, despite NJB's documented promotional efforts,[46] we find that NJB has satisfied the necessary capacity requirements.

16. Finally, in order to further assure sufficient capacity and nondiscriminatory access, we condition this order, as we have in several other Section 214 approvals of video

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[31] NCTA Petition at 3.

[32] NJCTA Petition at 4.

[33] NCTA Comments at 17, *citing* NJB Opposition at 5-6.

[34] *Id.* at 17.

[35] NJB Opposition at 5.

[36] Amended Application at 2. NJB states that so long as only 64 channels are available, no operations will commence until: (1) an effective tariff is in place; and (2) at least two programmers agree to use two-thirds of the system's capacity. *Id.* at n.7.

[37] *Id.*

[38] NJB Opposition at 5-7.

[39] NJB states in the declarations of Bell Atlantic's President of Regional Services, Stuart Johnson, and Bell Atlantic's Vice President-Regulatory and Industry Relations, Brian D. Oliver, that NJB's efforts to publicize its plans and to work with prospective programmers included sending invitations to participate in the video dialtone systems to all cable operators in New Jersey listed with the Office of Cable Television at the New Jersey State Board of Regulatory Commissioners. Cable operators were invited to join prospective NJB platforms before cities were selected for the platforms. NJB Opposition at 6, Decl. of Stuart Johnson at ¶ 3, Decl. of Brian D. Oliver at ¶ 8. We should note, however, that in general there is no obligation for a common carrier to engage in a specific amount of marketing of its services.

[40] *VDT Order* at ¶ ¶ 2, 29, 30.

[41] *SNET Trial*, at ¶ 13, n.46. In *SNET Trial* we also considered a fourth factor, applicable exclusively to trials, which was the duration of the offering.

[42] Adelphia Comments on Amended Application at 12.

[43] Failure to comply with conditions imposed in a Section 214 certificate may subject a carrier to a variety of penalties. *See, e.g.*, 47 U.S.C. §§ 406, 501, 502, 503.

[44] As originally proposed, NJB had committed 94% (60 of 64 channels) of the Dover system capacity to one program provider. The Commission questioned whether this arrangement satisfied video dialtone's non-discrimination requirements. FCC Letter, Question and Answer 6b. NJB subsequently modified that arrangement in the Amended Application, to restrict the use of any one programmer to a maximum of 32 of the initial 64 channels.

[45] We do not find problematic NJB's arrangements to provide 60 of the 384 channels to one programmer.

[46] *See* note 39, *supra*.

dialtone systems,[47] on a requirement that NJB report to the Chief, Common Carrier Bureau, within five days of its denying a programmer platform access due to capacity limitation. In its report, NJB also must describe the steps it will take to accommodate the rejected programmer.

17. NCTA also argues that we should not authorize these systems because NJB has struck "discriminatorily advantageous deals with favored customers *prior* to the filing of a public tariff."[48] NCTA contends that "once the tariff is filed, . . . customer-programmers should be able to arrange for access to the system on a *first-come, first-serve,* nondiscriminatory basis."[49] We find that NJB has not contravened our video dialtone requirements. Video dialtone achieves nondiscriminatory access for programmer-customers by requiring sufficient capacity to accommodate multiple programmers and by applying Title II regulation to the video dialtone platform to ensure that carrier dealings with programmer-customers are just, reasonable, and not unreasonably discriminatory. As discussed previously, we conclude that NJB's platform has sufficient capacity. Thus, programmer-customers other than FutureVision should be able, first, to obtain capacity irrespective of the prior arrangements. In addition, all programmers, even those with prior contractual arrangements, will be required to pay the tariff rates. We note that issues involving allegedly unreasonable discrimination in rates, terms or conditions contained in a video dialtone tariff can be addressed in the tariff review process.

18. Thus, we find NJB's proposed platform satisfies our requirements for video dialtone platforms.

B. Section 214 Issues

19. In order to grant an application for authorization under Section 214 of the Communications Act, the Commission must determine that a grant would serve the "public convenience and necessity." 47 U.S.C. § 214(a). Traditionally, the focus of the Section 214 review has been "to ensure that carriers prudently invest in equipment so as to avoid waste and unreasonably high rates" for telephone rate payers.[50] As part of the Commission's rules specifying the contents of Section 214 applications, Subsection 63.01(m) of the Commission's rules, 47 C.F.R. § 63.01(m), requires the applicant to provide an "[e]conomic justification for the proposed project including . . . estimated added revenues and costs and the basis thereof." The courts have granted the Commission a significant amount of latitude in making its determinations under Section 214.[51] In the *VDT Order,* we concluded that our existing safeguards were sufficient to protect against potential discrimination and cross-subsidy by telephone companies in their provision of video dialtone. We further stated, however, that we intended to reassess their adequacy as applied to Section 214 applications for specific video dialtone systems.[52]

20. We here find that NJB has provided sufficient information pursuant to our Section 214 filing rules, including economic justification, for us to find that the public convenience and necessity will be served by granting its applications. In addition, as is discussed in Subsection B 2 b ii, *infra,* the proposed system should result in investment in advanced communications infrastructure, which can contribute to economic growth and the nation's leadership in technology. The system also promises competition to the two local cable companies in the local video distribution markets,[53] diversity of distribution sources and information, increased access to networks and new services, and greater access of program suppliers to consumers and of consumers to additional information services. All of these potential benefits can increase commercial opportunity and the flow of ideas. We conclude that the public interest will be served by grant of the application, subject to the conditions specified below.

1. Comments

21. NJCTA and NCTA contend that NJB's application falls short of providing any cognizable economic evidence that the facilities in question are not being added for predatory purposes, or priced below cost to gain market power or an unfair competitive advantage.[54] NJCTA states that these economic issues should not be deferred to "the truncated tariff review process," but should be addressed by the Commission in its Section 214 evaluation of the public convenience and necessity.[55]

22. NJCTA contends that summary figures, without supporting detail, cannot be accepted as economic justification unless the Commission abandons all efforts at implementing meaningful safeguards as set forth in the *VDT Order.*[56] NJCTA specifically objects to NJB's assumption in its economic justification that revenues received from end-user subscribers would ultimately be split equally between the service provider and NJB,[57] to NJB's use of an 11.25% discount rate,[58] and to NJB's revenue projections of up to $35 per month for non-entertainment services.[59] In addition, according to NCTA, NJB's revenue projections as-

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[47] *SNET Trial, USWest Trial, Rochester Trial.*

[48] NCTA Comments on Amended Application at 17 (emphasis in original).

[49] *Id.*

[50] *American Telephone and Telegraph,* File No. W-P-C 5560, FCC 86-87, at ¶ 7 (released March 10, 1986) (*AT&T Authorization).*

[51] *Century Federal, Inc. v. FCC,* 846 F.2d 1479, 1481 (D.C. Cir. 1988) (*Century Federal).* In *FCC v. RCA Communications, Inc.,* 346 U.S. 86, 96-97 (1953), the Supreme Court stated that the Commission need not "make specific findings of tangible benefit" or find "a demonstration of . . . immediate benefit to the public." The court, however, continued, "the Commission must at least warrant . . . that competition [resulting from the grant] would serve some beneficial purpose." *See also General Telephone of the Southwest v. U.S.,* 449 F.2d 846, 858 (5th Cir. 1971).

[52] *VDT Order* at ¶ 89.

[53] The two cable operators, Adelphia and Monmouth, are each franchised for separate portions of Dover Township. Monmouth is franchised for Ortley Beach, Chadwich and part of Pelican Island. Adelphia is franchised for the remainder of Dover Township. *See* Application, Exhibit 1, Map of Service Area.

[54] NJCTA Petition at 8-10, 18-24.

[55] NJCTA Petition at 24; NJCTA Reply at 18, Affidavit of Leland L. Johnson, Affidavit of Patricia D. Kravtin; NCTA Reply at 6-9.

[56] NJCTA Reply at 14.

[57] NJCTA Petition, Affidavit of Patricia K. Kravtin (Kravtin Affidavit) at ¶ 20.

[58] NJCTA Reply at 22. NJCTA states that a more accurate discount rate would be 17-18% for home entertainment services and 25-35% for speculative new services. *Id.,* Kravtin Affidavit at ¶ 16. NJB states that an 11.25% discount rate is the current Commission prescribed rate of return for NJB's regulated interstate services. NJB Answers at 7.

[59] NJCTA Petition, Kravtin Affidavit at ¶ 23.

sume that NJB and its programmer-customers "will receive all video rental revenue generated by subscribers to its system now earned by video stores."[60]

23. In their comments, PaOCA, NJDRC and NJCTA contend that NJB's application is deficient because it does not include all costs relevant to the provision of video dialtone.[61] PaOCA contends that NJB should be required to amend its application to reflect the cost of the fiber optic lines that NJB excluded from its economic justification.[62] Commenters on the Amended Application contend that NJB still has not identified all of the common costs related to video dialtone.[63] PaOCA/NJDRC also state that the revenue projections by NJB indicate that "[b]roadcast CATV revenues are only able to cover 30% of New Jersey Bell's own estimated video dial tone costs," and that the remainder of revenues must come from "programming customers who apparently have not yet committed to providing video services . . . ."[64] If the Commission approves this application, PaOCA proposes that the Commission require NJB to maintain records of the actual costs and revenues and provide this information for public review.[65]

24. In its opposition, NJB claims that its video dialtone service is economically justified, and that the cost and revenue estimates provided are the type of support the Commission has previously found to be adequate.[66] In addition, NJB states that all incremental costs to add video dialtone capability to its network have been included in its economic justification, including the cost of coaxial drops.[67] NJB states that the addition of a video dialtone capability is the only subject of the Commission's Section 214 review, not the overall deployment of fiber, which provides a variety of benefits unrelated to video.[68] In any event, NJB asserts that even if the net cost[69] of all fiber cabling is attributed to video dialtone, it will reach the break-even point near the end of the year 2003.[70] NJB further contends that because service prices are not established in a Section 214 proceeding, there are no issues to be decided as to how NJB should allocate the costs among its regulated services in order to set prices.[71] According to NJB, these issues are premature and should be addressed when NJB files a tariff to provide video dialtone service.[72]

2. Discussion

a. Section 214 Legal Standard

25. In order to grant an application for authorization under Section 214 of the Communications Act, the Commission must determine whether a grant would serve the "public convenience and necessity."[73] Courts have found that this statutory standard "is to be construed so as to secure for the public the broad aims of the Communications Act,"[74] including the overarching goal expressed in Section 1 of the Communications Act.[75] Section 1 of the Communications Act charges the Commission with the task of making available to the nation a "rapid, efficient, Nation-wide... communication service with adequate facilities at reasonable charges . . . ."[76] Administration of this standard is generally left to the discretion of the Commission: "[I]t is entirely within the Commission's discretion to accept even a minimal showing of financial justification" for approval of a Section 214 application.[77]

26. In its analysis of the public convenience and necessity under Section 214, the Commission has generally focused on the "added," or "incremental," costs and revenues of the facilities for which authorization is sought.[78] We have generally interpreted Section 214 to require some showing that existing or future demand for services provided over the proposed facility will justify these added costs within some reasonable period of time.[79] We note, however, that the Commission has approved Section 214 applications in circumstances where this test was not met.[80]

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[60] NCTA Reply at 8.

[61] PaOCA and NJDRC Request at 2; NJCTA Petition at 15.

[62] PaOCA/NJDRC Request at 3, incorporating by reference PaOCA/NJDRC Request for Consumer Safeguards in W-P-C 6838, New Jersey Bell Telephone Company (Florham Park) (PaOCA/NJDRC Florham Request) at 16; NCTA Petition at 4-5.

[63] NCTA Comments on Amended Application, pp. 6, 11.

[64] PaOCA/NJDRC Request at 3, incorporating by reference PaOCA/NJDRC Florham Request at 17, n.4.

[65] PaOCA/NJDRC Request at 3, incorporating by reference PaOCA/NJDRC Florham Request at 17. According to PaOCA, this monitoring would assist the parties and the Commission in determining the actual economic feasibility of video dialtone services furnished through the systems proposed by NJB.

[66] NJB Opposition at 7, 9. NJB relies on *Century Federal*, 846 F.2d at 1481, to support its use of summary cost estimates and a table of revenues and expenses.

[67] NJB Opposition at 10-11, note 38.

[68] *Id.* at 12-13.

[69] As used by NJB, "net cost" is cost of the investment less savings generated by the investment. According to NJB, savings would be realized because of the generally lower maintenance costs of a network upgraded from copper to fiber. NJB Opposition, Decl. of Brian Oliver at ¶ 12.

[70] NJB Opposition, Declaration of Brian Oliver at ¶ 13.

[71] *Id.* at 15.

[72] *Id.*

[73] 47 U.S.C. § 214(a); *see also Washington Utilities and Transportation Commn. v. FCC*, 513 F.2d 1142, 1157 (9th Cir. 1976)(*Washington Utilities*).

[74] *Western Union Division, Commercial Telegrapher's Union, A.F. of L. v. U.S.*, 87 F. Supp. 324, 335 (D.D.C.), *aff'd*, 338 U.S. 864 (1949) (*Western Union Division); Washington Utilities* at 1157.

[75] *Id* at 335.

[76] 47 U.S.C. § 151.

[77] *Century Federal*, 846 F.2d at 1481.

[78] *See, e.g., Tropical Radio Telegraph Co.*, 35 FCC 2d 950, 952, 957 (1972), *aff'd on recon.*, 40 FCC 2d 1168 (1974) (TRT's methodology "to estimate the added revenue and costs for the proposed service is adequate to satisfy the requirements of Section 63.01(m)"); *Policy to be Followed in Future Licensing of Facilities for Overseas Communications*, 67 FCC 2d 358, 394 (1977) (*Overseas Communications), recon. granted in part*, 70 FCC 2d 1348 (1978); *All American Cables and Radio, Inc.*, File No. W-P-C 4990 (Com. Car. Bur., released May 7, 1986) (*All American Cables)* at ¶ 6.

[79] *See, e.g., Communications Satellite Corp.*, 80 FCC 2d 170, 181-2 (1980), *vacated on other grounds*, 86 FCC 2d 712 (1981). *See also American Telephone and Telegraph Company*, 7 FCC Rcd 445, 446 (1992) ("Under the traditional form of demand analysis that we have applied in authorizing the construction and operation of submarine cable systems, we conclude that projected circuit demand, along with other factors, supports the operation of [the proposed facility] in 1992 to meet the telecommunications needs of the Joint Applicants..."); *American Telephone & Telegraph Co.*, 8 FCC 2d 1007, 1012 (1967) ("It appears... that the proposed facilities... will be required to meet... demand for telephone service in this area").

[80] In *American Satellite Corp.*, we stated that in the "young and evolving" domestic satellite market "we do not require a common carrier applicant . . . to demonstrate that sufficient rev-

27. Our rules expressly ask for the "*added* revenues and costs" generated by the proposed project.[81] Commission orders interpreting our Section 214 rules have relied on an examination of added costs. The Commission has determined, for example, that "estimates of additional . . . costs . . . are the relevant costs to be considered," and that we will not take into consideration "sunk costs" or "embedded costs" already invested in existing facilities.[82]

28. Section 214 authorizations do not require the level of detail demanded by petitioners. For instance, in *AT&T Authorization* we stated that "[g]enerally the Section 214 proceeding examines cost only insofar as it is necessary to determine, on a *prima facie* basis, whether costs are so substantial relative to benefits that the public interest would not be served by construction of the project."[83] Similarly, in a cable channel service application, we found it sufficient to rely on summary charts submitted by the applicant.[84] A "[d]etailed economic justification . . . by a carrier [is] not required in a Section 214 authorization. In a Section 214 proceeding, costs are examined only generally . . . ."[85]

29. Nor have we required the level of certainty demanded by petitioners. We have only required a finding that the estimates "do not appear unreasonable."[86] In examining an application for cable channel service, the Bureau recognized that "a degree of risk is inevitable if service offerings of this type are to be developed."[87] Rather than denying the application, the Bureau granted it conditioned on a separate accounting of costs so that shareholders and not ratepayers would bear the burden of failure.[88] In the early stages of the domestic satellite market we stated that "[i]f a carrier waited until it was sure of a large demand for traffic, few stations would ever be built, while initial service demands go unsatisfied."[89]

30. Finally, the Commission's review of a Section 214 application is not restricted merely to the financial aspects of the application. As stated above, the range of the Commission's inquiry into the "public convenience and necessity" is at least as broad as the purposes of the Communications Act. Where a carrier's estimates of viability are not free from doubt, the Commission has found that public interest benefits to be gained from the new technology may nonetheless support a grant of a Section 214 application.[90] Thus, in *AT&T*, where the applicant proposed supplementing existing facilities with a fiber lightguide cable, the Commission stated that "[t]his experience is necessary to foster the technological developments that will lead to learning curve' decreases in cost. Without experience in the early stages of development we may never see some of the advances that fiber technology promises to bring to telecommunications users."[91]

b. Application of Section 214 Standard to NJB Application

31. We conclude that a conditioned grant of the NJB application will serve the public convenience and necessity under Section 214. We find that NJB's showings of economic justification satisfy the requirements of our regulations. Our statutory finding is premised as well on the public interest benefits we find in the construction of the video dialtone system and on our imposition of conditions in this authorization for a separate accounting of the costs of the video dialtone system. As part of this examination, we have reassessed the adequacy of our safeguards that would apply to this specific Section 214 application, and conclude, at least during the pendency of the various petitions seeking reconsideration of the *VDT Order*, that those safeguards, with the conditions we impose on this authorization, will be sufficient to protect against possible anticompetitive conduct by NJB.[92] We note that petitions to deny in this proceeding and petitions for reconsideration of the *VDT Order* raise issues regarding the need for additional codified safeguards against anticompetitive conduct.[93] Our decision in this adjudication, based on the record in this proceeding, is without prejudice to, and in no way constrains, any action that we may take on reconsideration of the *VDT Order*. In addition, we condition our grant on the requirement that NJB comply prospectively with any rule changes made on reconsideration of the *VDT Order*, or other applicable rulemaking proceeding.

i. Economic Justification

32. We find that under the standards of Section 214, NJB has submitted sufficient cost and revenue support for the Commission to grant the application. NJB has supplied summaries of the incremental plant investment cost that will be incurred by its proposals. NJB has also supplied a

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enues will be obtained for that facility to cover its construction and operating costs over its anticipated lifetime." 65 FCC 2d 279, 288 (1977), *aff'd sub nom., Hawaiian Telephone Company v. FCC*, 589 F.2d 647 (1978).

[81] 47 C.F.R. § 63.01(m)(emphasis supplied). Section 63.01, which specifies the contents of a § 214 application, repeatedly speaks in terms of an accounting of the "added" facilities, costs, and revenues generated by the proposed construction. Subsection (e) speaks of facilities that "extend" or "supplement." Subsection (h)(2) inquires about "additional channels of communication," and Subsection (i) asks about increased traffic loads. Subsection (k)(3) specifically requests information on the labor and material costs of the proposed facilities, and for "added equipment cost and each other added cost to the applicant."

[82] *Overseas Communications*, 67 FCC 2d at 394; *see also, All American Cables, supra* at ¶ 5 (authorization granted where the applicant relied solely on "incremental costs without allocating common costs").

[83] *AT&T Authorization*, at ¶ 7.

[84] *Century Federal*, 846 F.2d at 1481.

[85] *All American Cables* at ¶ 6 (*quoting AT&T Authorization* at ¶ 8).

[86] In *Pacific Bell*, the Bureau found that "[t]hese estimates do not appear unreasonable . . . . Century has not presented evidence warranting a finding that Pacific's request is *prima facie* unjustified or that a hearing is necessary." 60 RR 2d 1175, 1180 (Com. Car. Bur., released July 22, 1986), *recon. denied*, 2 FCC Rcd 265 (1987), *aff'd sub nom. Century Federal.*

[87] *Wisconsin Bell*, 56 RR 2d 1262, 1267 (Com. Car. Bur. 1984), *application for review denied*, FCC 84-618 (released Dec. 13, 1984), *recon. denied*, FCC 85-348 (released July 11, 1985).

[88] The Bureau concluded there that the basis of the applicant's revenue estimate was not "so suspect that it requires further investigation," and that the projections "do not appear unreasonable." Id. at 1267.

[89] *American Satellite Corp.*, 65 FCC 2d at 288.

[90] *See AT&T Co.*, 84 F.C.C. 2d 303, 311 (1981).

[91] *Id.* at 3 12.

[92] Existing safeguards are described in the *VDT Order* at ¶ 89.

[93] *See VDT Order, pets. for recon. pending; see also,* Amendments of Parts 32, 36, 61, 64 and 69 of the Commission's Rules to Establish and Implement Regulatory Procedures for Video Dialtone Services, RM-8221, filed by the Consumer Federation of America and NCTA, April 8, 1993 (CFA/NCTA Joint Petition).

break-even analysis consisting of projected annual revenue and annual costs of the video dialtone system. These summaries appear to include all added revenues and costs directly attributable to the proposed system.[94] Under the applicable legal standard, NJB need not include any additional costs. For purposes of this proceeding, we believe NJB has provided the categories and types of costs required by our Section 214 rules, and in sufficient specificity, to enable us to determine that the public convenience and necessity will be served by construction and operation of the proposed facilities.

33. We also find NJB's revenue estimates generally reasonable. NJB projects an end-user subscriber sign-up rate of approximately 35% of the 38,000 homes passed.[95] This rate, NJB states, reflects the fact that there are two competing cable companies already operating in Dover Township, the proposed video dialtone service area. NJB estimates that in the early years, one hundred percent of revenues will be generated by services analogous to current video entertainment services, such as cable, broadcast and video rentals. Ultimately that percentage is expected to decline to 40-50% with the balance of the revenues to be obtained from other services.[96] NJB cites statements in the *VDT Order*[97] and in a study commissioned by the New Jersey Board of Public Utilities as evidence of latent demand for these new services, which range from home shopping to health, education and multimedia research.[98]

34. NJB's revenue figures appear consistent with the available market evidence. NJB estimates that in ten years its monthly revenue-per-subscriber will be $73.[99] Of this amount, $30, or 41%, will be for conventional entertainment services available today, such as cable TV and movies-on-demand.[100] NJB cites a trade study showing that in ten years consumers will be willing to pay $70 a month for these services, which NJB estimates will be divided evenly among the telephone company and programmers.[101] The remaining $43 (59% of $73) of the monthly revenue estimate will be generated by other video information services. Current video trade revenue figures do not include revenues from these other video information services, enhanced and otherwise, but these services also should bring additional revenues to the NJB platform. The Commission has stated that there appears to be a potential market for such services,[102] and NJB has cited its own evidence.[103]

35. We also find that the discount rate of 11.25% selected by NJB is not unreasonable. That rate is the rate of return for interstate regulated services for rate-of-return telephone companies,[104] and this rate is normally used in pricing new regulated services, such as video dialtone basic common carrier platform services, under price cap regulation.[105] Even though different local telephone companies and different regulated services are today subject to varying degrees of competition, we have prescribed a unitary rate of return for all exchange carriers and their interstate regulated service offerings. This approach recognizes the fact that the capital marketplace generally rates the risk of entire companies and not individual services. Moreover, determining a reasonable rate of return for individual services can be difficult.[106] Petitioners cite no precedent in which we have required a local telephone company to use a discount rate that exceeds a carrier's authorized rate of return to justify approval under Section 214. For these reasons, we decline to require NJB to justify its Dover Township video dialtone system using a higher discount rate.[107]

36. NJB's economic justification statement indicates that, with volume equipment discounts from suppliers, the project is expected to break even[108] in as early as four years. Without volume discounts the projected break-even time period is six years. NJB adds that even if the net cost[109] of the common fiber cabling is included in the overall cost figures, and volume discounts are included, a break-even point of five years is projected.[110]

37. Without endorsing either NJB's specific figures or projected break-even estimates, we conclude that NJB has made a *prima facie* showing of the reasonableness of its estimated costs and revenues, sufficient to satisfy the eco-

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[94] NJB Amended Application at 10-12; NJB Reply to Comments on Amended Application at 15, citing Amendment of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture: Policy and Rules Concerning Rates for Dominant Carriers, Report and Order & Order on Further Reconsideration & Supplemental Notice of Proposed Rulemaking, CC Docket Nos. 89-79 and 87-313, 6 FCC Rcd 4524, ¶ 42 (1991) (*Part 69/ONA Order); second further recon.*, 7 FCC Rcd 5235 (1992) (*Part 69/ONA Reconsideration*), ("a LEC introducing new services will be required to identify the direct costs of providing the new service, absent overheads....").

[95] NJB Opposition at 8 and Decl. of Brian Oliver at ¶ 11.

[96] NJB Opposition, Weber Decl. at ¶ 5.

[97] NJB Opposition at 8, and NJB Opposition, Decl. of Joseph Weber at ¶ 9, *citing VDT Order* at 5794.

[98] NJB Opposition, Weber Decl. at ¶ 9.

[99] NJB Opposition, Oliver Decl., Attachment A; Weber Decl., ¶ 5. Weber estimated monthly revenues at $25.55 per home-passed. On a per-subscriber basis, at an estimated 35% sign-up rate, NJB's estimated revenues come to $73 per month.

[100] *Id.*, Weber Decl. at 4.

[101] *Id.* Weber Decl. at ¶ ¶ 22-24, *citing* a 1991 LINK Resources, Inc. survey.

[102] There is "substantial evidence of potential demand for technologically advanced telephone company participation in the video market," and that "the potential demand for video network capabilities is evidenced by the growing interest of educational, medical, governmental and business institutions." *VDT Order* at ¶ ¶ 22-24.

[103] NJB Opposition, Decl. of Joseph Weber at ¶ 9.

[104] *Represcribing the Authorized Rate of Return for Interstate Services of Local Exchange Carriers*, 5 FCC Rcd 7507, ¶ 1 (1990) (*Rate of Return Order*).

[105] *Open Network Architecture Tariffs of Bell Operating Companies*, 9 FCC Rcd 440, 450-51, ¶ 25 (1993).

[106] *See Rate of Return Order* at ¶ ¶ 1, 3.

[107] We also are unconvinced by the specific higher discount figures urged by petitioners for the video entertainment business. In our recent *Report and Order and Further Notice of Proposed Rulemaking*, FCC 94-39, MM Docket No. 93-215, CS Docket No. 94-28, Released March 30, 1994, at ¶ 147, we required cable television companies to use a 11.25% rate of return in any cost-of-service showing to charge prices higher than the relevant benchmark.

[108] "Break-even" means that on a cumulative present worth basis, revenues will equal costs. NJB Opposition, Attachments B & C.

[109] The "net cost" of an investment is the cost of the investment less savings generated by the investment. NJB Opposition, Decl. of Brian Oliver, at ¶ 13.

[110] NJB Opposition, Decl. of Brian Oliver, Attachments B and C.

nomic justification requirements of Section 214.[111] NJB's figures reasonably relate to a known current market, the home video market, and that market has demonstrated a consistent demand for vido services, as evidenced by the success of the cable industry. NJB also has presented evidence of the potential for revenue from other non-cable related video information services. In all, NJB has presented estimates and other evidence that "do not appear unreasonable."[112] Finally, as described below, we do agree with petitioners' arguments that we should require NJB to account separately for its video dialtone costs.

ii. Public Interest Benefits of This Video Dialtone System

38. In finding that video dialtone is in the public interest, the Commission identified various potential benefits that this service is likely to produce. These benefits include: (1) promoting private investment in an advanced telecommunications infrastructure, (2) providing additional competition in the provision of video services, and (3) providing additional opportunities for consumer choice through a diversity of video services.[113] We believe that the NJB Dover video dialtone system will provide these and other benefits. Therefore, in addition to finding that NJB has satisfied the economic justification requirements of Section 214, we also find that NJB's application will help secure for the public the broad aims of the Communications Act, including the provision of a "rapid, efficient, Nation-wide . . . communication service with adequate facilities at reasonable charges."[114]

39. NJB's proposal clearly will produce new investment in an advanced telecommunications infrastructure. The proposed integrated broadband and narrowband digital networks capable of providing at least 384 video channels would stand at the cutting edge of technology. Video servers, video administration modules, remote access modules, host digital terminals, multi-subscriber optical network units and associated software are among the advanced infrastructure elements under development. Some of the plant necessary for video dialtone will be used for services other than video dialtone, so there are benefits from the plant beyond the benefits generated by video dialtone. In addition, investment in these elements benefit the nation in other important ways. Such investment stimulates manufacturing of high technology products, increases employment opportunities, creates potential export markets, and provides many indirect benefits in other fields, including marketing, training, and education.

40. The proposal also promises additional competition in the provision of video services. The system in Dover will compete directly with the two existing cable television systems. The planned 384 channels to be offered by NJB would increase dramatically the number of video channels available to end-user subscribers in the proposed service area of Dover Township. Creating new outlets and opportunities for programmers and other users of system capacity will result in many of the same kinds of economic benefits that arise from investments in advanced infrastructure. These include employment opportunities in information services, potential export opportunities, and secondary stimulative effects on supporting services and industries.

41. Finally, the proposals will give consumers in Dover additional choices. NJB states the system will offer a minimum of 384 channels. While we, and NJB, can anticipate the likely and potential users of system capacity, there is no way of knowing either the precise choices that end-users will find most attractive, or the new choices that will become available in five or ten years. The system will offer open access to multiple service providers, and access to those providers for consumers. This access is consistent with the nation's fundamental commitment to diversity and competition in the flow of ideas, not only with respect to entertainment but also with respect to education, health, and commerce.

iii. Accounting Conditions and the Tariffing Process

42. As in *Wisconsin Bell*, we condition this authorization on a requirement that NJB establish subsidiary accounting records to capture the revenues, investments and expenses associated with the provision of video dialtone service. These subsidiary accounting records shall include the direct costs and overheads associated with video dialtone service. A summary of these records shall be reported to the Commission on a quarterly basis. We delegate to the Chief, Common Carrier Bureau the authority to determine the content and format of the subsidiary accounting records as well as the quarterly reports. Of course, as generally required by our cost allocation rules, any enhanced and non-common carrier services must be reflected in NJB's Cost Allocation Manual (CAM),[115] and we condition its authorization by requiring NJB to make revisions to its manual to ensure that the costs of nonregulated ventures are segregated from the costs of regulated activities in order to prevent any cross-subsidization. At a minimum, we require NJB to revise its CAM to include a list of all accounts affected by its provision of nonregulated video dialtone services and a description of each of those services. Again, we emphasize that the decision we make here, and the conditions we attach to it, are without prejudice to, and in no way constrain, any action that we may take on reconsideration of the *VDT Order* or other applicable rulemaking proceeding.

43. Our action in this proceeding in no way limits our ability to ensure, in the subsequent tariff review process, that NJB's tariffed rates for video dialtone service are just and reasonable. It is clear that consideration of costs in a Section 214 proceeding is distinct from the examination of rates in the tariff review process.[116] As the Commission staff stated in a 1986 decision, "[a] detailed inquiry into tariff related matters ... would vitiate the distinction between tariff and facilities authorization procedures and would require the Commission to engage in duplicative processes."[117] Prior to providing service, NJB must file tariffs,

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[111] In *Pacific Bell* the Bureau concluded a *prima facie* case was made where revenues would cover expenses in approximately 4 years. *Pacific Bell* at 1180. *Pacific Bell* involved common carrier construction of broadband transmission facilities for the holder of a non-exclusive cable franchise.

[112] *Pacific Bell* at 1180.

[113] *VDT Order* at ¶ 9.

[114] *See Western Union Division*, 87 F Supp at 335; 47 U.S.C. § 151.

[115] 47 C.F.R. §64.903.

[116] *All American Cables* at ¶ 5.

[117] *AT&T Request for Authorization to Supplement Existing Lines*, W-P-C 5560, Mem. Op. and Order (released March 10, 1986)(*AT&T Authorization)* at ¶ 8.

and cost support information, which will be available for review. In the *Part 69 ONA Proceeding*, the Commission established pricing standards for new services ("the new services test") offered by companies subject to the price cap method of regulation.[118] In setting an upper bound for such services, the Commission adopted a "flexible cost-based approach to pricing new services."[119] Under this test, the Commission requires LECs introducing new services to submit engineering studies, time and wage studies or other cost accounting studies to identify the direct costs of providing the new service, absent overheads.[120] Once the direct costs have been identified, LECs may add an "appropriate level of overhead costs to derive the overall price of 0 the new service.[121] To provide the flexibility needed to achieve efficient pricing while protecting against excessively high rates, the Commission did not mandate uniform loading, but expected the LECs to justify the loading methodology they selected as well as any deviations from that loading methodology.[122] The purpose of this approach is to provide the LECs sufficient pricing flexibility to encourage innovation and efficient pricing while protecting against either excessively high rates or unreasonably discriminatory or predatory pricing.[123] It is against these standards that we will judge the reasonableness of the tariffed rates NJB proposes for its video dialtone services. Finally, we note that parties to this proceeding raised no concerns about the illustrative tariff submitted by NJB with the Application beyond the concerns about rates, revenues and costs discussed above.[124]

IV. NCTA'S MOTION FOR INVESTIGATION

44. On May 4, 1994, the National Cable Television Association, Inc. (NCTA) filed a Motion for Investigation. The Motion alleges that NJB is violating Section 214 of the Communications Act by constructing interstate video dialtone facilities before obtaining the necessary authority from the Commission. We are not persuaded that the evidence in the record demonstrates a violation of Section 214, or that there is any need to investigate further.

A. The NCTA Motion and Responses

45. NCTA argues that the Commission has long interpreted Section 214 as requiring telephone companies to obtain prior authorization to construct video distribution facilities.[125] In addition, notes NCTA, the *VDT Order* specifically requires Section 214 authorization for the provision of video dialtone services.[126] NCTA cites a press story in which an official of NJB's parent company, Bell Atlantic, is reported to have said that substantial construction has already taken place for the Dover system, and that "all that's left to do is insert electronics to make the network capable of delivering video."[127] According to NCTA, NJB's video dialtone application identifies much more investment for interstate video dialtone than merely electronics.[128] NCTA argues that if the press statement is true, NJB appears to be in violation of Section 214's bar on interstate construction prior to Commission approval. NCTA urges the Commission to delay action on NJB's Section 214 application until completion of an investigation.

46. In its response to the NCTA motion, NJCTA raises additional allegations. NJCTA contends that in addition to extensive deployment of fiber optic cables in the Dover Township area, much of the video dialtone equipment and facilities described in NJB's applications are already "on the poles and in the ground."[129] NJCTA presents affidavits and photographs alleging to show extensive construction activity relating to video dialtone service.[130] NJCTA points to two general types of facilities installed by NJB that it alleges are related to video dialtone: fiber and related equipment, and drops.[131] Specifically, NJCTA asserts that NJB has installed optical network units (ONUs) and a number of drops that include both twisted pair and coaxial components. For instance, NJCTA submits a photograph that it describes as showing an ONU in Dover with six video outputs connected to coaxial drop cables.[132] According to NJCTA, the installations it describes are impermissible pending grant of Section 214 authority.

47. In addition, NJCTA argues that NJB's activities are not consistent with New Jersey's regulatory proceedings, or with "Bell Atlantic's state regulatory activities," because the New Jersey Board of Regulatory Commissioners (New Jersey Board) clearly understood that NJB's deployment of an advanced network is far more than an upgrade of the existing network to provide telephone service. Rather, according to NJCTA, one of its principal purposes is to deploy video services.[133]

48. NJB denies that it has constructed video facilities covered by its Section 214 application. NJB argues that all of the fiber and equipment that it is deploying are needed to provide telephone service. NJB states that, for the most part, it "has not . . . taken delivery of video equipment and facilities covered by its application, let alone installed them."[134] NJB, however, does note one apparent exception to this statement. NJB states that, in investigating NJCTA's allegations, it determined that it had taken delivery of a

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[118] *Part 69/ONA Order; Part 69/ONA Reconsideration.*

[119] *Part 69/ONA Order*, para. 38; *Part 69/ONA Reconsideration*, paras. 2-3, & 6.

[120] *Part 69/ONA Order*, para. 42; *Part 69/ONA Order Reconsideration*, para. 12.

[121] *Part 69/ONA Order*, para. 38-39, 41-42, & 44; *Part 69/ONA Order Reconsideration*, paras. 2-3 & 12.

[122] *Part 69/ONA Order*, paras. 38-39, 41-42 & 44; *Part 69/ONA Reconsideration*, paras. 3, 8, & 11.

[123] *Part 69/ONA Order*, para. 38; *Part 69/ONA Reconsideration*, para. 12.

[124] NJB Application at Exhibit 5.

[125] NCTA Motion at 1.

[126] NCTA Motion at 1.

[127] NCTA Motion at 2.

[128] NCTA cites from the Dover application 11 broad categories of capital costs including: remote terminal equipment - host digital terminal; remote terminal equipment - HDT software; central office electronics; fiber - headend to CO; fiber - CO to HDT; supertrunk transmitters - arrangements; supertrunk transmitters - cards; audio/video preprocessing; optical network unit; video administration module; drop/network interface. NCTA Motion at 3.

[129] NJCTA Response at 3.

[130] NJCTA Response, Exhibit A.

[131] NJCTA Response at 4-6.

[132] *See* NJCTA Response, Exhibit A, photograph number 5.

[133] NJCTA Response at 7-12.

[134] NJB Opposition to NCTA at 2; *see* Declaration of Dennis M. Bone, VP-External Affairs, Bell Atlantic, attached to NJB Opposition to NCTA (*Bone Declaration*), at 2.

number of reels of coaxial and composite cable and connectors. According to NJB, a previous search to confirm that no video equipment had been delivered did not reveal these items, "presumably because they are normal inventory items in [NJB's] warehouse data base."[135]

49. In the case of equipment that could be used to provide both telephone service and video dialtone service, Bell Atlantic says that it is installing only the portions of the equipment needed for telephone service, and not the additional components needed to add video dialtone capability, pending approval of its Section 214 application.[136] For example, NJB states that it has not installed any of the line card components that are needed to add a video dialtone capability to the ONUs.[137]

50. With regard to the installation of cable coaxial drops, NJB states that the bulk of these drops were connected to ONUs as part of the vendor selection process during a test of the capabilities of four competing vendors.[138] NJB states that a "small number" of additional composite drops, which contain both coaxial and twisted pair wire in a single common sheath, were installed in 1993. NJB asserts that these drops are needed to provide local telephone service as well as video dialtone service, and that it had initially planned to deploy such common facilities along with the network upgrade. NJB asserts that the drops could permissibly have been installed without Section 214 authority, but that it has ceased the installation of such drops pending Section 214 authorization "out of an abundance of caution."[139]

51. NJB argues that while the Commission has required Section 214 approval to provide video dialtone capability, it has never suggested that such approval is needed to upgrade the underlying network to the extent that it will be used to provide local telephone exchange service. NJB argues that any facilities needed to provide local telephone service may be installed as part of its underlying network upgrade, without awaiting approval of its application.[140] Bell Atlantic asserts that the Commission could not require Section 214 certification for two reasons. First, according to NJB, Section 214(a) expressly provides that no authorization is required "for any installation, replacement, or other changes in plan, operation, or equipment." NJB asserts that its underlying network upgrades that will be used to provide local telephone service fall within the scope of this exemption.

52. Second, NJB argues that facilities used to provide telephone exchange service continue to be regulated by state authorities, and that such facilities are excluded from the Commission's reach by both Section 214 and Section 221 of the Act.[141] Citing *Kitchen v. Bell Telephone Co. of Pennsylvania*, 31 FCC 2d 604 (1971) (*Kitchen*), aff'd 464 F.2d 801 (D.C. Cir. 1972), NJB states that the Commission has recognized that while the services travelling over local telephone networks may be both interstate and intrastate, the local exchange facilities are predominantly intrastate in nature, and do not require Section 214 approval.[142]

53. Finally, NJB argues that its construction activities are fully consistent with New Jersey's regulatory requirement that it provide broadband capability throughout the state by 2010.[143]

54. In reply, NCTA states that NJB's response lacks specificity and that NJB has failed to clarify exactly which "electronics to make the network capable of delivering video" remain to be put in place.[144] It states that the Commission must determine the purpose of the ONUs and the cable drops referred to in NJCTA's Response before taking action on NJB's Section 214 applications.[145] NCTA denies that NJB's network upgrade is beyond the scope of Section 214. NCTA notes that "twenty-five percent of the intrastate access telephone plant and 100 percent of the video plant is assigned to the federal jurisdiction,"[146] and asserts that state jurisdiction cannot usurp Congressionally-established federal responsibility in Section 214.[147] NCTA concludes that "[i]t is impossible based on the evidence submitted by NCTA and NJCTA to conclude that premature construction has not occurred."[148]

B. Discussion

55. The issue posed by the NCTA motion and the NJCTA response is whether NJB's construction of facilities as part of its network upgrade before receiving Section 214 certification constitutes a violation of Section 214 of the Communications Act. NCTA and NJCTA have not persuaded us that NJB has violated Section 214, or that any further investigation of this issue is warranted. We conclude that the network upgrades that NJB has undertaken to provide local exchange service do not require Section 214 certification.

56. Section 214(a) of the Communications Act, as amended, prohibits a carrier from constructing a "new line" or an extension of a "new line," or from engaging in transmission over or by means of such a line, "unless and until there shall first have been obtained from the Commission" a certificate of public convenience and necessity. The Act defines "line" as "a channel of communication established by use of appropriate equipment, other than a channel of communication established by the interconnection of two or more existing channels."[149] Section 214 specifically exempts from the certification requirement "a line within a single State unless such line constitutes part of an interstate line."[150]

57. There are three types of facilities at issue in this case: facilities to be used solely for the provision of local exchange telephone service; facilities to be used for both telephony and video dialtone service; and facilities to be

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135 Supplemental Declaration of Dennis M. Bone, attached to NJB Reply to NJCTA (*Supplemental Declaration*) at 3.
136 NJB Reply to NJCTA at 1-3; *Supplemental Declaration* at 2.
137 NJB Reply to NJCTA at 2 n.5; *Bone Declaration* at 2-3; *Supplemental Declaration* at 2.
138 *Supplemental Declaration* at 2-3; NJB Reply to NJCTA at 2-3.
139 NJB Reply to NJCTA at 2-3; *Supplemental Declaration* at 3.
140 NJB Reply to NJCTA at 3-6.
141 *Id.* at 4-6.
142 NJB Reply to NJCTA at 5.
143 *Id.* at 6-7.
144 NCTA Reply to Opposition to Motion at 1.
145 *Id.* at 2.
146 *Id.*
147 *Id.* at 2-3 (*citing Louisiana Public Service Comm'n v. FCC*, 476 U.S. 355 (1986)).
148 NCTA Reply to Opposition to Motion at 3.
149 47 U.S.C. § 214(a).
150 *Id.*

used solely for the provision of video dialtone. NJB states that it has begun construction on the first two types of facilities, but not the third – those facilities used only for video dialtone.[151] NJB certifies that, with the exception of some reels of coaxial and composite cable and connectors, it has not even taken delivery of the video facilities or equipment covered by its application.[152] NJB avers that for those facilities that have joint-use capabilities (such as optical network units), it is only deploying "the components ... needed to provide telephone service, not the additional components needed to add a video dialtone capability."[153] With respect to NJCTA's photograph number 5, showing video outputs connected to coaxial drop cables,[154] NJB indicates that some drops connected to the video posts on the ONUs were installed only as part of its vendor selection process.[155] The number of such drops, moreover, appears to be *de minimis*.[156] NJB also explains that the ONUs are not operational because no line cards have been installed.[157] NJB further explains that neither line cards nor any other video facilities will be installed until Commission approval is granted.[158] Thus, with the minimal exception noted above, the record indicates that the facilities that NJB is currently constructing are all needed for the provision of local exchange service. The issue, then, is whether such facilities should be viewed as intrastate, or as part of an interstate line. If the former, no Section 214 certification is necessary at this time.

58. The courts have recognized that whether a facility is intrastate or interstate depends on the character of service for which it is used.[159] Because local exchange facilities almost always connect at some level with facilities dedicated to interexchange interstate services, one could read Section 214 to require FCC certification before construction of any local exchange facilities. That reading, however, would eviscerate the notion of purely intrastate facilities, and has not been our practice. In *Kitchen, supra*, the Commission found that no Section 214 authority was needed to construct a building to house switching equipment, stating that "clearly some division between interstate and intrastate authority must be made, and [what is proposed] is primarily, if not exclusively, related to an intrastate activity under the jurisdiction of the State regulatory Commission."[160]

59. In this case, prior to approval of NJB's video dialtone Section 214 application, intrastate telephone service will constitute the primary, if not the exclusive, use of the facilities constructed by NJB. Much like the building at issue in *Kitchen*, the upgraded network construction that Bell Atlantic will use for local exchange service is primarily, if not exclusively, intrastate. We conclude, therefore, that it is not subject to the requirement of Section 214 certification. In sum, no Section 214 certification is required because the record shows that the facilities that NJB has constructed to date will be used to provide local exchange, but not video dialtone, service.

60. NJCTA argues that NJB's network upgrade is inconsistent with "Bell Atlantic's New Jersey regulatory activities," and that it cannot be viewed as just local exchange service construction because video dialtone was understood by the New Jersey Board to be part of NJB's plan. We disagree with the contention that NJB's plans to add video dialtone capability in the future turn its network upgrade into an interstate construction. Section 214 does not require NJB to obtain authorization before its network upgrades begin, but only before those facilities unrelated to local exchange service that will allow for interstate (video dialtone) usage are actually constructed.

61. As the Common Carrier Bureau held in *Northwestern Telephone Systems, Inc.*,[161] a carrier can construct facilities for intrastate use without obtaining a Section 214 certification, even if it plans further construction to allow for interstate use, "as long as the interstate use of the lines does not occur prior to acquisition of necessary federal authority."[162] The Bureau there rejected a claim that the applicant should have filed a Section 214 application before constructing a purely intrastate special access facility, even though the applicant intended to use the facility for interstate service in the future after connecting it with additional facilities. The Bureau stated that the applicant only need obtain a Section 214 certificate before using the facility for interstate service.[163]

62. Here, NJB need not obtain Section 214 authorization until it begins to construct the video-dialtone-only portions of its network. Before adding video dialtone facilities unrelated to the provision of local exchange service, however, NJB must obtain Section 214 certification,[164] as the addition of video dialtone capability will alter the character of the service provided over these facilities. We emphasize that this conclusion does not in any way impair our jurisdiction to regulate any interstate services, such as interstate access, that may be provided over those facilities once constructed.

63. Our interpretation of the application of Section 214 of the Act to NJB does not place interstate ratepayers at risk. The Commission stated in the *VDT Order* that it would use the Section 214 process to apply its antidiscrimination and cost allocation safeguards to specific video dialtone proposals, and we have done so here.[165] NJB's construction of part of its broadband network pursuant to the decision of the New Jersey Board before obtaining a Section 214 certification will not eliminate the Commission's ability to apply its safeguards. No costs re-

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[151] *See* NJB Opposition to NCTA at 1-2; *Bone Declaration* at 2-3; NJB Reply to NJCTA at 2-3; *Supplemental Declaration* at 2-3.

[152] *See supra* note [9]; NJB Opposition to NCTA at 2 n.4; *Bone Declaration* at 2; *see also*, NJB Reply to NJCTA; *Supplemental Declaration* at 1-2.

[153] *Supplemental Declaration* at 2.

[154] NJCTA Response at 2.

[155] *Supplemental Declaration* at 2.

[156] In its application, NJB estimates that its system will pass 38,000 homes in Dover Township. NJB states that in the vendor selection process four competing vendors placed 70 drops each. *Id.* Moreover, the record indicates that the vendor selection test took place during June and July, 1993, and is therefore complete. *Id.*

[157] *Id.*

[158] *Bone Declaration* at 1-2; *Supplemental Declaration* at 2.

[159] *See, e.g., General Telephone Company of California v. FCC*, 413 F.2d 390 (D.C. Cir. 1969).

[160] *Kitchen*, 31 FCC 2d at 608.

[161] *Northwestern Telephone Systems, Inc.*, 5 FCC Rcd 876, 877 (Com. Car. Bur. 1990).

[162] *Id.*

[163] *Id.*

[164] *See VDT Order* at ¶ 72.

[165] *See* Section III, B, 2, b, *supra*.

lated specifically to video dialtone can be allocated to the interstate jurisdiction until the Commission grants Section 214 certification.

64. To the extent that NJCTA is arguing that the New Jersey Board would not have approved NJB's plans as a local exchange-only upgrade, we see no reason to withhold approval of the Section 214 application or to investigate further. NJCTA, while citing to several sections of the New Jersey Board order, cites to no language that we can interpret as conditioning approval of the "Opportunity New Jersey" plan on the provision of interstate video dialtone services. Nor have we identified any such language in our own review. At the time that the New Jersey Board approved NJB's "Opportunity New Jersey" plan, it was clearly aware that New Jersey Bell's Section 214 application for video dialtone was still pending, and had not been granted.[166] As the New Jersey Board chose to go forward in approving the plan nevertheless, we must assume that it was willing to bear the risk that the network" upgrades might be used only for telephony.

C. Other Allegations and Issues

65. NJCTA contends that a software licensing agreement between NJB and FutureVision may violate the telephone company-cable television cross-ownership rules regarding permissible affiliations.[167] According to NJCTA, a trade press article reporting that NJB and FutureVision have entered into a licensing agreement for providing software for the Dover video dialtone system indicates a closer relationship than is revealed in NJB's Section 214 application.[168] In addition, NJCTA states that, based on information in the trade press article, NJB plans to engage in cross-promotional activities among programmers and local and national advertisers to provide subscribers coupons and other promotional items after the subscriber has made specific service choices over the interactive system.[169] NJCTA asserts that these and other services may impact NJB's cost allocation methodology.[170]

66. NJB states that the software that is the subject of the FutureVision-NJB licensing agreement "is not part of the regulated video dial tone service and therefore is irrelevant to Bell Atlantic's 214 applications.[171] NJB explains that in order to interconnect with its basic service platform, video programmer-customers must have software to interface with NJB's video administration module (VAM), which is part of the network.[172] NJB states that interconnection with the VAM is necessary so that programmer-customers can add and delete individual subscribers' video service, schedule video programming, retrieve billing information, and edit individual channel parameters.[173] According to NJB, FutureVision developed its own version of this software, based on technical data purchased from NJB, and subsequently offered to allow NJB to license the software to other video programmer-customers.[174] NJB states that other programmer-customers can license the software from NJB, or directly from FutureVision, or can develop their own software.[175] NJB also states that NJB obtained no ownership interest in FutureVision by virtue of the licensing agreement.[176]

67. The telephone company-cable television cross-ownership rules allow telephone companies to exceed the carrier-user relationship with a video programmer by providing services and engaging in activities, not related to the provision of video programming directly to subscribers by the telephone company.[177] Telephone companies may provide services and engage in activities related to video programming as long as the video programmer is a customer of, interconnects with, or shares the construction and/or operation of, the basic common carrier platform.[178] We conclude that the software licensing agreement between NJB and FutureVision does not violate the cross-ownership rules. In the *VDT Order*, we stated that joint ventures, interconnection agreements, consultant-client relationships, and other relationships that do not constitute ownership or control of the video programmer are permitted between telephone companies and video programmers provided that the affiliation does not involve telephone company provision of video programming directly to subscribers.[179] The licensing agreement concerns software necessary to facilitate video programmer interconnection to NJB's basic platform. Based on the information in the record, this agreement does not involve the provision of video programming directly to subscribers by NJB. Furthermore, NJB avers that it obtained no ownership interest in FutureVision as a result of the licensing agreement. Thus, NJB does not appear to have a cognizable financial interest in video programming provided directly to subscribers.

68. In connection with NJCTA's allegation that cross-promotional activities may impact its cost allocation methodology, we require that to the extent NJB provides enhanced and non-common carrier services, these services are reflected in NJB's cost allocation manual (CAM) and are provided in compliance with the conditions set forth above.[180]

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[166] *See* Exhibit G to NJCTA Response, Decision and Order of the New Jersey Board of Regulatory Commissioners on Motion of NJCTA to Reopen Record, dated February 26, 1993, referring to the filing by NJB of an application with the FCC to provide video dialtone pursuant to Section 214 of the Communications Act.

[167] NJCTA Response at 13-14.

[168] *Id.* at 13, *citing* "Bell Atlantic Installs Multimedia Network Software," *Multichannel News*, Jan. 3, 1994, at 23-24. Since the agreement between FutureVision and NJB was reached after revisions to NJB's Dover application were made, NJCTA states that no information regarding the software or equipment is accounted for in NJB's revised exhibits. *Id.* at 13.

[169] *Id.*

[170] *Id.* at 14.

[171] Reply of Bell Atlantic (New Jersey Bell) to Response in Support of Motion for Investigation at 7.

[172] *Id.*

[173] *Id.* at 8, n.24.

[174] *Id.* at 8.

[175] *Id.*, n.26.

[176] *Id.*

[177] 47 C.F.R. § 63.54(d)(2).

[178] *Id.* A telephone company may not (1) determine how video programming is presented for sale to consumers (including making decisions concerning the bundling or tiering, or the price, terms, and conditions of programming offered to consumers), or (2) otherwise have a cognizable financial interest in, or exercise editorial control over, video programming provided directly to subscribers within its telephone service area. *Id.*

[179] *VDT Order* at 5798, ¶ 31.

[180] *See* Section III, B, 2, B, iii, *supra*.

V. CONCLUSION

69. We find that NJB's proposed video dialtone system for Dover Township, as presented in the Amended Application, will serve the public convenience and necessity. NJB has supplied the information necessary to demonstrate the fulfillment of the requirements set forth in the *VDT Order* and our rules. With the conditions we attach to the grant of authority, we assure sufficient protections to guard against unreasonable discrimination and improper cross-subsidy. The public interest will be served by expeditious implementation of the projects. Our action herein is without prejudice to any subsequent action that might be taken in response to tariffs filed for these projects, or in rulemaking or other proceedings.

VI. ORDERING CLAUSES

70. Accordingly, IT IS ORDERED that, pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, the application of New Jersey Bell Telephone Company (File No. W-P-C 6840), subject to the conditions stated below, IS GRANTED, effective upon the release of this order. New Jersey Bell Telephone Company is authorized to provide video dialtone, within its service area as described in its application.

71. IT IS FURTHER ORDERED that the petitions to deny filed by Adelphia Communications Corporation, the Association of Independent Television Stations, Inc., the National Association of Broadcasters, the National Cable Television Association, the New Jersey Cable Television Association, the Monmouth Cablevision Associates, and the Public Service Commission of the District of Columbia ARE DENIED; that the Request by the Pennsylvania Office of Consumer Advocate and the New Jersey Department of Public Advocate, Division of Rate Counsel for Consumer Safeguards is DENIED; that the requests in the Consumer Federation of America's Letter of Opposition are DENIED; that the Motion for Extension of Time by the New Jersey Cable Television Association is GRANTED IN PART, and time to file comments on the New Jersey Bell Amended Application IS EXTENDED until September 30, 1993; and that the National Cable Television Association's Motion for Investigation is DENIED.

72. IT IS FURTHER ORDERED, that grant of this application IS SUBJECT TO the following conditions:

a) That New Jersey Bell obtain Commission approval of any revisions to its Cost Allocation Manual (CAM) prior to providing any enhanced and non-common carrier services.

b) That New Jersey Bell create subsidiary accounting records to capture the revenues, investments and expenses associated with the provision of video dialtone service and file accurate copies of those records for public inspection with the Secretary of the Federal Communications Commission on a quarterly basis. We delegate to the Chief, Common Carrier Bureau the authority to determine the content and format of the subsidiary accounting records as well as the quarterly reports. NJB is further required to keep subsidiary accounting records to identify by each Part 32 account the amount of all plant that is being replaced (that is, no longer used or useful) as a result of the deployment of video dialtone plant.

c) That New Jersey Bell provide all video programmers access to the basic platform under the same terms and conditions; In addition, that New Jersey Bell shall report to the Chief, Common Carrier Bureau, within five days of denying any video programmer access to the platform due to capacity limitations, in whole or in part, and on the steps taken to expand the capacity of the platform to accommodate demand.

d) That any video dialtone service offered in Dover Township through January 3, 1995, must have at least 64 channels, and that after January 3, 1995 any such service must have a capacity of at least 384 channels.

e) That New Jersey Bell comply prospectively with any changes in our rules that result from rulemakings or from reconsideration of our *Second Report and Order* in CC Docket 87-266.

f) That NJB and its affiliates not directly provide video programming on this video dialtone system.

73. Pursuant to Section 214(c) of the Communications Act of 1934, as amended, 47 U.S.C. § 214 (c), the grant of New Jersey Bell's application to provide each video dialtone service is subject from the date of issuance of this grant to the conditions provided herein, and is also subject to any Commission rules and/or orders that result from any existing or future proceeding or proceedings that address video dialtone cost allocations, jurisdictional separations, and pricing issues.

FEDERAL COMMUNICATIONS COMMISSION

William F. Caton
Acting Secretary

APPENDIX: Pleadings Filed

Application, New Jersey Bell (Application)

Petitions to Deny:

Adelphia Communications Corp. (Adelphia Petition)

Association of Independent Television Stations, Inc. (INTV Petition)

National Association of Broadcasters (NAB Petition)

National Cable Television Association (NCTA Petition)

New Jersey Cable Television Association (NJCTA Petition)

Monmouth Cablevision Associates (Monmouth Petition)

Public Service Commission of the District of Columbia DCPSC (DCPSC Petition)

Letter of Opposition to the Application, Consumer Federation of America (CFA Opposition)

Request for Consumer Safeguards, The Office of Consumer Advocate for the Commonwealth of Pennsylvania (PaOCA) and the New Jersey Department of Public Advocate, Division of Rate Counsel (NJDRC), jointly (PaOCA/NJDRC Request)

Opposition to Petitions to Deny, New Jersey Bell (NJB Opposition)

Replies to Opposition to Petitions to Deny:

Adelphia (Adelphia Reply)

Monmouth (Monmouth Reply)

NCTA (NCTA Reply)

NJCTA (NJCTA Reply)

Response to Informal FCC Questions, NJB (NJB Answers)

Comments on NJB Answers

Adelphia Comments (Adelphia Response)

NJCTA Replies (NJCTA Response)

NJB Amendment and Clarification (Amended Application)

Erratum to New Jersey Bell Amended Section 214 Application

Comments on the Amendment and Clarification:

Adelphia (Adelphia Comments)

DCPSC (DCPSC Comments)

NAB (NAB Comments)

NCTA (NCTA Comments)

NJCTA (NJCTA Comments)

Monmouth (Monmouth Comments)

PaOCA/NJDRC (PaOCA/NJDRC Response)

Reply to Comments, NJB (NJB Reply)

Motion for Investigation, NCTA (NCTA Motion)

Opposition to Motion for Investigation, NJB (NJB Opposition to NCTA)

Response in Support of Motion for Investigation, NJCTA (NJCTA Response)

Reply of Bell Atlantic (New Jersey Bell) to Response in Support of Motion for Investigation, NJB (NJB Reply to NJCTA)

Reply to Opposition to Motion for Investigation, NCTA (NCTA Reply to Opposition to Motion)

SEPARATE STATEMENT

OF

COMMISSIONER ANDREW C. BARRETT

RE: Video Dialtone Application (Dover Township, NJ)

This Order and Authorization grants the New Jersey Bell Telephone Company's (NJB) Section 214 authority to construct, operate, own, and maintain advanced fiber optic facilities and equipment to provide video dialtone service to approximately 38,000 homes in Dover Township, Ocean County, New Jersey. More specifically, the Commission is granting this application subject to conditions that are intended to safeguard against unreasonable cross-subsidy and discrimination by NJB, as well as to ensure that NJB reaches the 384 channel capacity in a timely fashion. Accordingly, the Commission's decision conditions the authorization so that any video dialtone service offered in Dover after January 3, 1995 must have a capacity of at least 384 channels.

I am writing separately on this decision to emphasize the importance of moving forward in authorizing video dialtone service in order to promote the significant public interest benefits that are attainable through the new service, for which this is the first application to be granted. I am interested, however, that we continue to address a few remaining fundamental concerns regarding the process of authorizing video dialtone services. First, the issue of system capacity is a critical consideration to enable video programming customers to gain access to the system in such a way as to address potential discrimination concerns. In this instance, I believe that the initial capacity of 64 channels with conditions for the subsequent increase to 384 channels is appropriate in order to balance the potential for setting a troublesome precedent that may result in unreasonable delays in implementing video dialtone while at the same time taking the critical steps to avoid neglecting necessary safeguards.

Second, I am aware that parties have raised issues regarding how to allocate the costs among video services and other regulated voice services, amid other general concerns regarding the Commission's process for authorizing video dialtone services. In this regard, I emphasize that the question of whether NJB has provided adequate cost data and economic justification has already prompted a request for further data, and the cost allocation issue will continue to be evaluated in further detail at the tariff stage as well as on reconsideration. As a result, I believe the Commission is warranted in moving forward in granting this application, with the understanding that the fundamental concerns regarding cost treatment will be addressed at a later, appropriate time.

SEPARATE STATEMENT
OF
COMMISSIONER SUSAN NESS

Re: *Bell Atlantic Section 214 Application to Provide Video Dialtone Service to Dover Township, New Jersey*

Our action today represents another important step toward the goal of enabling consumers to choose from among multiple video delivery platforms. I believe we are serving congressional intentions and fulfilling consumer needs.

A new day is dawning. No longer will telephone companies simply provide telephone services and cable companies merely provide video programming services. Video dialtone, together with direct broadcast satellite and wireless cable, can -- over time -- provide consumers with a range of choices. As in other areas where the Commission has promoted the introduction of competition, competition in video delivery services will foster lower prices, stimulate new services, and encourage the development and deployment of new technologies.

In the case of video delivery services, competition will have an additional benefit: it will eliminate the need for intrusive regulation of cable rates. Cable rate regulation presents difficulties for the cable industry and for the Commission, but, as the Congress determined in the Cable Act of 1992, it is necessary to protect the public in the current market environment. Over the longer term, however, Congress expressed a clear preference for competition over rate regulation. Today's decision takes us closer to that goal.

As we begin to approve applications to provide commercial video dialtone service, it is important to remember that thorny cost allocation issues and other consumer protection issues must be properly resolved. In this case, I am satisfied that we can grant Bell Atlantic's Section 214 application without foreclosing our ability to adopt the measures necessary to protect telephone service ratepayers and otherwise to promote the public interest, in Dover Township and across the nation.

Petitions for reconsideration of the video dialtone order are pending, as are related petitions for rulemaking. Tariffs to provide video dialtone service have yet to be reviewed. This application is itself being granted subject to conditions. For these reasons, I am satisfied that vehicles for further consideration of important public policy issues remain available.

But we can and should begin -- as we do today -- ushering in an era of new choices and services for consumers and new competition to cable service.

Before the
Federal Communications Commission
Washington, D.C. 20554

PUBLIC NOTICE

Released: August 1, 1994

FEE DECISIONS OF THE MANAGING DIRECTOR AVAILABLE TO THE PUBLIC

The Managing Director is responsible for fee decisions in response to requests for waiver or deferral of fees as well as other pleadings associated with the fee collection process. On a monthly basis, a public notice is released and the entire text of these fee decisions is published in the FCC Record.

The decisions are placed in General Docket 86-285 and are available for public inspection. A copy of the decision is also placed in the appropriate docket, if one exists.

The following Managing Director fee decisions are released for public information:

Citadel Communications Corporation - Request for waiver of a filing fee in connection with an application for a minor modification for a FM station at Bozeman, Montana - **Granted** (June 10, 1994).

Covey, David - Request for refund of a hearing fee for a new FM station at Glen Falls, New York - **Granted** (June 9, 1994).

Dakota Broadcasting, Inc. - Request for waiver of a filing fee in connection with an application for a minor modification for a AM station at Brookings, South Dakota - **Granted** (June 10, 1994).

Rowland, Sr., Marshall W. - Request for refund of a hearing fee for a new FM station at Sasser, Georgia - **Denied** (June 10, 1994).

Stevens, Robert M. - Request for refund of a filing fee for a new (FM station at Galeton, Pennsylvania - **Denied** (June 9, 1994).

Van Hoof-Schroeder, Mary J. - Request for refund of a hearing fee for a new FM station at Kaukauna, Wisconsin - **Granted** (June 9, 1994).

Victory Christian Center, Inc. - Request for refund of a hearing fee for a new FM station at Harrisburg, North Carolina - **Granted** (June 10, 1994).

NOTE: ANY QUESTIONS REGARDING THIS REPORT SHOULD BE DIRECTED TO THE PREPARER, CLAUDETTE PRIDE, CHIEF, FEE SECTION ON (202) 632-0241.

FEDERAL COMMUNICATIONS COMMISSION

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

10 JUN 1994

Marnie K. Sarver, Esq.
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036-2506

Dear Ms. Sarver:

This will respond to your request for waiver of the filing fee submitted on behalf of Citadel Communications Corporation ("Citadel"), licensee of KATH(FM), Bozeman, Montana, in connection with its Form 302 minor modification application. You state that Citadel filed its minor change application for the sole purpose of correcting its construction permit to reflect the current height of its specified tower.

The Commission may waive filing fees only upon a showing of good cause and a finding that the public interest will be served thereby. See Establishment of a Fee Collection Program to Implement the Provisions of the Consolidated Omnibus Budget Reconciliation Act of 1985, 2 FCC Rcd 947, 961 (1987); see also 47 C.F.R. §1.1115. We have determined that the Citadel has demonstrated good cause for waiver of the filing fees, and that the public interest in the accurate description of the licensee's specified tower outweighs any processing costs that the Commission may incur.

Accordingly, your request for a waiver of the filing fee is granted. A check, made payable to the maker of the original check and drawn in the amount of $565.00, will be sent to you at the earliest practicable time. If you have any questions concerning this refund, please contact the Chief, Fee Section at (202) 632-0241.

Sincerely,

Marilyn J. McDermett

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

JUN 9 1994

Joseph E. Dunne III, Esq.
May & Dunne
1000 Thomas Jefferson Street, N.W.
Suite 520
Washington, D.C. 20007

Re: David Covey
New FM Station
Glens Falls, New York
Fee Control #9304238170006001

Dear Mr. Dunne:

This is in response to your request for refund of the fee submitted in the above-referenced matter.

Your request is granted. We have reviewed the facts surrounding your filing and have concluded that a refund is warranted pursuant to Section 1.1111 of the Commission's rules. 47 C.F.R. §1.1111. The subsection checked below is specifically applicable to your request.

_____ No fee is required for the above referenced submission (§1.1111(a)(1)).

_____ An insufficient fee has been submitted with the application/filing (§1.1111(a)(2)).

_____ The applicant cannot fulfill the prescribed age requirement (§1.1111(a)(4)).

_____ The Commission has adopted a new rule that has nullified the application after its acceptance for filing (§1.1111(a)(4)).

_____ A new law or treaty has rendered useless a grant or other positive disposition of the application (§1.1111(a)(4)).

_____ The application was not timely filed in accordance with the filing window as established by the Commission (§1.1111(a)(6)).

__X__ In the case of a broadcast applicant, the application was granted without being designated for hearing (§1.1111(b)(1)).

_____ In the case of a broadcast applicant, the application was dismissed prior to designation for hearing or in the order designating the case for hearing (§1.1111(b)(2))

_____ In the case of a broadcast applicant, the application was dismissed for failure to file a Notice of Appearance (§1.1111(b)(2)).

_____ In the case of a broadcast applicant, the applicant was the only applicant in the proceeding to file a Notice of Appearance and the application was immediately grantable (§1.1111(b)(3)).

_____ In the case of a broadcast applicant, the applicant was the only applicant in the proceeding who filed a Notice of Appearance and the application was immediately grantable upon deletion of a matter(s) specified in the designation order and requiring resolution (§1.1111(b)).

_____ In the case of a broadcast applicant, a settlement agreement filed with the presiding judge by the Notice of Appearance deadline provided for the dismissal of all but the above-referenced application, and the application was immediately grantable (§1.1111(b)(4)).

_____ In the case of a broadcast applicant, a settlement agreement filed with the presiding judge by the Notice of Appearance deadline provided for dismissal of all but the above-referenced application and the application was immediately grantable upon deletion of a matter(s) specified in the designation order and requiring resolution (§1.1111(b)(4)).

A check, made payable to the maker of the original check and drawn in the amount of $6,760, will be sent to you at the earliest practicable time. If you have any questions concerning this refund, please contact the Chief, Fee Section at (202) 632-0241.

Sincerely,

Marilyn J. McDermett

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

JUN 10 1994

Ellen S. Mandell, Esq.
c/o Pepper & Corazzini
200 Montgomery Building
1776 K Street, N.W.
Washington, D.C. 20006

Dear Ms. Mandell:

This will respond to your request for waiver of the filing fee submitted on behalf of Dakota Broadcasting, Inc. (DBI), licensee of KBRK(AM) in Brookings, South Dakota, in connection with its Form 302 minor modification application. You state that DBI filed its minor change application for the sole purpose of correcting the Commission's records regarding the geographical coordinates of its tower as reported in the underlying Form 301 minor modification applications.

The Commission may waive filing fees only upon a showing of good cause and a finding that the public interest will be served thereby. See Establishment of a Fee Collection Program to Implement the Provisions of the Consolidated Omnibus Budget Reconciliation Act of 1985, 2 FCC Rcd 947, 961 (1987); see also 47 C.F.R. §1.1115. We have determined that DBI has demonstrated good cause for waiver of the filing fees, and that the public interest in the accurate description of the location of an antenna tower outweighs the processing costs that the Commission incurs to correct such errors.

Based on the foregoing, your request for a waiver of the filing fee is granted.

Sincerely,

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

JUN 10 1994

Gary S. Smithwick, Esquire
Smithwick & Belendiuk, P.C.
1990 M Street, N.W.
Suite 510
Washington, D.C. 20036

Re: Marshall W. Rowland, Sr.
New FM Station
Sasser, Georgia
Fee Control # 9403148170063001

Dear Mr. Smithwick:

This is in response to your request for refund of the hearing fee submitted in the above-referenced matter.

Public Notice, FCC 94-41, released February 25, 1994, which suspended the filing of hearing fees in conjunction with the Commission's freeze on comparative licensing proceedings, provides no basis for returning your client's fee. Hearing fees filed prior to the date of that Public Notice were not suspended by the Commission.

Accordingly, your request for a fee refund is denied.

Sincerely,

Marilyn J. McDermett

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

FEB 1994

Robert M. Stevens
1005 Treasure Lake
DuBois, Pennsylvania 15801

Re: Application (BPH-920713MA)
New FM Station
Galeton, Pennsylvania
Fee Control #9207148195368002

Dear Mr. Stevens:

This is in response to your request for a filing fee refund ($2030) submitted in conjunction with the above-referenced application.

A review of the facts surrounding the filing of that application reveals that a refund is not warranted. Briefly, those facts show that the application was filed during the time when the Commission's "FM Hard Look" processing procedures were in effect, and that the Mass Media Bureau processed the application consistent therewith and concluded that it was unacceptable for grant due to an engineering defect in the information provided. Hence, return of the application by the Bureau was proper, and payment of the fee for its processing was required.

Public Notice, FCC 90-59, released February 9, 1990, does not require a different result. The Commission by that notice merely announced certain changes in the "FM Hard Look" rules, including authorizing the staff to waive those rules to permit one opportunity to amend to correct acceptability defects when only one applicant had applied in response to an announced filing window. It did not, however, similarly accord the same opportunity to amend to "First Come, First Serve" applicants. Consequently, since you filed as the latter and not as a sole applicant in response to a filing window, the Bureau correctly concluded that you were not entitled to file a corrective amendment.

Accordingly, your request for a fee refund is denied.

Sincerely,

Marilyn J. McDermett

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

F. Joseph Brinig, Esq.
Brinig and Bernstein
1818 N Street, N.W.
Suite 200
Washington, D.C. 20036

Re: Mary J. Van Hoof-Schroeder
New FM Station
Kaukauna, Wisconsin
Fee Control #9209118170383003

Dear Mr. Brinig:

This is in response to your request for refund of the fee submitted in the above-referenced matter.

Your request is granted. We have reviewed the facts surrounding your filing and have concluded that a refund is warranted pursuant to Section 1.1111 of the Commission's rules. 47 C.F.R. §1.1111. The subsection checked below is specifically applicable to your request.

_____ No fee is required for the above referenced submission (§1.1111(a)(1)).

_____ An insufficient fee has been submitted with the application/filing (§1.1111(a)(2)).

_____ The applicant cannot fulfill the prescribed age requirement (§1.1111(a)(4)).

_____ The Commission has adopted a new rule that has nullified the application after its acceptance for filing (§1.1111(a)(4)).

_____ A new law or treaty has rendered useless a grant or other positive disposition of the application (§1.1111(a)(4)).

_____ The application was not timely filed in accordance with the filing window as established by the Commission (§1.1111(a)(6)).

__X__ In the case of a broadcast applicant, the application was granted without being designated for hearing (§1.1111(b)(1)).

_____ In the case of a broadcast applicant, the application was dismissed prior to designation for hearing or in the order designating the case for hearing (§1.1111(b)(2)).

_____ In the case of a broadcast applicant, the application was dismissed for failure to file a Notice of Appearance (§1.1111(b)(2)).

_____ In the case of a broadcast applicant, the applicant was the only applicant in the proceeding to file a Notice of Appearance and the application was immediately grantable (§1.1111(b)(3)).

_____ In the case of a broadcast applicant, the applicant was the only applicant in the proceeding who filed a Notice of Appearance and the application was immediately grantable upon deletion of a matter(s) specified in the designation order and requiring resolution (§1.1111(b)).

_____ In the case of a broadcast applicant, a settlement agreement filed with the presiding judge by the Notice of Appearance deadline provided for the dismissal of all but the above-referenced application, and the application was immediately grantable (§1.1111(b)(4)).

_____ In the case of a broadcast applicant, a settlement agreement filed with the presiding judge by the Notice of Appearance deadline provided for dismissal of all but the above-referenced application and the application was immediately grantable upon deletion of a matter(s) specified in the designation order and requiring resolution (§1.1111(b)(4)).

A check, made payable to the maker of the original check and drawn in the amount of $6,760, will be sent to you at the earliest practicable time. If you have any questions concerning this refund, please contact the Chief, Fee Section at (202) 632-0241.

Sincerely,

Marilyn J. McDermett
Associate Managing Director
for Operations

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

OFFICE OF
MANAGING DIRECTOR

JUN 10 1994

John E. Fiorini III, Esq.
Gardner, Carton & Douglas
1301 K Street, N.W.
Suite 900
Washington, D.C. 20005

Re: Victory Christian Center, Inc.
New FM Station
Harrisburg, North Carolina

Dear Mr. Fiorini:

This is in response to your request for refund of the fee submitted in the above-referenced matter.

Your request is granted. We have reviewed the facts surrounding your filing and have concluded that a refund is warranted pursuant to Section 1.1111 of the Commission's rules. 47 C.F.R. §1.1111. The subsection checked below is specifically applicable to your request.

_____ No fee is required for the above referenced submission (§1.1111(a)(1)).

_____ An insufficient fee has been submitted with the application/filing (§1.1111(a)(2)).

_____ The applicant cannot fulfill the prescribed age requirement (§1.1111(a)(4)).

_____ The Commission has adopted a new rule that has nullified the application after its acceptance for filing (§1.1111(a)(4)).

_____ A new law or treaty has rendered useless a grant or other positive disposition of the application (§1.1111(a)(4)).

_____ The application was not timely filed in accordance with the filing window as established by the Commission (§1.1111(a)(6)).

_____ In the case of a broadcast applicant, the application was granted without being designated for hearing (§1.1111(b)(1)).

_____ In the case of a broadcast applicant, the application was dismissed prior to designation for hearing or in the order designating the case for hearing (§1.1111(b)(2)).

_____ In the case of a broadcast applicant, the application was dismissed for failure to file a Notice of Appearance (§1.1111(b)(2)).

_____ In the case of a broadcast applicant, the applicant was the only applicant in the proceeding to file a Notice of Appearance and the application was immediately grantable (§1.1111(b)(3)).

_____ In the case of a broadcast applicant, the applicant was the only applicant in the proceeding who filed a Notice of Appearance and the application was immediately grantable upon deletion of a matter(s) specified in the designation order and requiring resolution (§1.1111(b)).

__X__ In the case of a broadcast applicant, a settlement agreement filed with the presiding judge by the Notice of Appearance deadline provided for the dismissal of all but the above-referenced application, and the application was immediately grantable (§1.1111(b)(4)).

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A check, made payable to the maker of the original check and drawn in the amount of $6,760, will be sent to you at the earliest practicable time. If you have any questions concerning this refund, please contact the Chief, Fee Section at (202) 632-0241.

Sincerely,

Marilyn J. McDermett
Associate Managing Director
for Operations

Before the
Federal Communications Commission
Washington, D.C. 20554

DA 94-706

In the Matter of	)	
	)	
1994 Annual Access	)	CC Docket No. 94-65
Tariff Filings	)	
	)	
National Exchange	)	Transmittal No. 612
Carrier Association	)	
Universal Service Fund	)	
and Lifeline Assistance Rates	)	

MEMORANDUM OPINION AND ORDER SUSPENDING RATES

Adopted: June 24, 1994 **Released: June 24, 1994**

By the Deputy Bureau Chief, Common Carrier Bureau:

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Appendix A -- Parties
Appendix B -- Analysis of Price Cap Indices

I. EXECUTIVE SUMMARY

1. In this Order, the Common Carrier Bureau reviews the annual access tariff filings that local exchange carriers (LECs) and the National Exchange Carrier Association, Inc. (NECA) are required by Section 69.3(a) of the Commission's rules, 47 C.F.R. § 69.3(a), to submit on April 2, 1994, to become effective on July 1, 1994.[1] Based on our review, we direct certain LECs to refile rates, in accordance with this Order.[2]

2. The tariffs filed by LECs subject to price cap regulation[3] propose a total of $307.0 million in access charge reductions. These access reductions are apportioned among access categories as follows: end user charges would increase by $28.7 million; carrier common line charges would decrease by $152.7 million; traffic sensitive charges would decrease by $40.9 million; rates in the interexchange basket would decrease by $8.6 million; and rates in the new trunking basket would decrease by $133.5 million.

3. In addition, NECA proposes to lower its traffic sensitive and special access rates by a total of $53.8 million,[4] and to decrease common line rates by $8.0 million. The price cap LECs and NECA propose aggregate rate reductions of $368.8 million for the 1994 access year.

4. In this Order, the Bureau suspends those LECs' annual access tariffs that raise issues concerning how sharing and lower end adjustment mechanisms should be treated when the LEC

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[1] A companion Order in CC Docket No. 94-65 deals with the annual access filings made by Nevada Bell, Pacific Bell, Rochester Telephone Corporation, and Vista Telephone Company of Minnesota and Vista Telephone Company of Iowa.

[2] Appendix A contains a list of those parties who filed pleadings in this proceeding and sets forth their full names and the abbreviated versions that are used to refer to them in the text of the Order.

[3] The price cap companies include the Bell Operating Companies (BOCs), GTE (including GTE Telephone Operating Companies (GTOC) and GTE System Telephone Companies (GTSC)), Lincoln, Rochester, SNET, and Sprint LTD (which includes United and Central). Price cap companies and NECA account for almost 95 percent of interstate revenues from access charges.

[4] NECA proposed the traffic sensitive and special access rate reductions in a transmittal filed prior to its annual access filing. NECA Transmittal No. 601 (filed March 25, 1994). NECA subsequently deferred the effective date of this transmittal to July 1, 1994, and the revisions proposed therein were incorporated into NECA's annual access filing, NECA Transmittal No. 602 (filed Mar. 25, 1994). The captioned NECA filing, NECA Transmittal No. 612 (filed May 17, 1994), contains proposed revisions to the universal service fund (USF) and Lifeline Assistance rates, which are discussed at Section IV, *infra*.

4. In this Order, the Bureau suspends those LECs' annual access tariffs that raise issues concerning how sharing and lower end adjustment mechanisms should be treated when the LEC computes its rate of return for the year in which those adjustments were made and incorporates those tariffs into the Commission's pending investigation of the same issues in CC Docket No. 93-193. In addition, this Order rejects proposals made by the petitioners to treat equal access amortizations exogenously. This Order also rejects proposals by some price cap LECs to include certain regulatory fees as exogenous costs in their price cap indices (PCIs), and instead directs those LECs to adjust their PCIs to reflect endogenous treatment of the fees. Finally, this Order suspends those provisions in the annual access filings, identified by petitioners or the Bureau, that present issues that are substantially similar to, or closely dependent upon the resolution of, issues currently under investigation in CC Docket 93-193, and incorporates those provisions into that investigation.

II. PRICE CAP CARRIERS

A. Sharing and Lower End Adjustment Issues

1. Implementation of the Sharing and Lower End Adjustment Mechanisms

(a) Background

5. Under price cap regulation, a LEC is required to make a sharing adjustment to its PCIs if its rate of return for the preceding calendar year exceeds 12.25 percent,[5] and may make a lower end adjustment to its PCIs if its rate of return for that period falls below 10.25 percent.[6] The sharing and lower end adjustments are made as one-time adjustments to a single year's rates.[7] Recently, the Commission tentatively concluded in the *Add-Back Notice* that LECs should continue to be required to reflect the effects of the sharing and lower end adjustments when calculating their rates of return for the year subsequent to the year in which they incurred

---

[5] The 12.25 benchmark applies to LECs that operate with a 3.3 productivity offset. LECs that elect the more challenging 4.3 productivity offset do not have to make a sharing adjustment unless their rate of return exceeds 13.25 percent. Policy and Rules Concerning Rates for Dominant Carriers, Second Report and Order, 5 FCC Rcd 6786 (1990) (*LEC Price Cap Order*), Erratum, 5 FCC Rcd 7664 (Com. Car. Bur. 1990), *modified on recon.*, 6 FCC Rcd 2637 (1991) (*LEC Price Cap Reconsideration Order*).

[6] For example, under the sharing adjustment a LEC that uses the 3.3 percent productivity offset must share with its customers half of its earnings between 12.25 percent and 16.25 percent, and all of its earnings in excess of 16.25 percent. Under the lower end adjustment, a LEC that posts earnings below 10.25 percent, is entitled to adjust its rates upward to target earnings to 10.25 percent (the "lower end adjustment") in the following year. *LEC Price Cap Order* , at 6788, 6801-02.

[7] *Id.* at 6803; *see also LEC Price Cap Reconsideration Order*, 6 FCC Rcd at 2691 n.166.

the sharing or lower end obligation.[8] The Commission further tentatively concluded that the price cap rules should be amended to clarify this requirement.[9]

(b) Contentions of the parties

6. **(1) Sharing Issues.** MCI contends that Ameritech, Bell Atlantic, and BellSouth have understated their sharing obligations by failing to include an adjustment to revenues to offset the effect of the sharing adjustment.[10] MCI asserts that sharing amounts under price caps, like refunds under rate of return regulation, must be added back in order to ascertain whether any new sharing obligations exist in the current reporting period. Because of these alleged sharing understatements, MCI concludes that these carriers' tariffs should be suspended and investigated. MCI also asserts that it fully agrees with the Commission's proposal in the *Add-Back Notice* to require the adjustment to offset the earlier sharing adjustment, and that the Commission should not allow LECs to avoid their sharing obligations under price caps.[11] Allnet also maintains that all LECs that implemented sharing amounts in this year's tariff filings should be subject to an accounting order and the outcome of the investigation initiated in the *1993 Annual Access Order*.[12]

7. In reply some LECs maintain that adoption of an add-back mechanism for sharing purposes runs counter to the fundamental goals and principles underlying price cap regulation and would represent a reversion to rate-of-return principles.[13] These LECs say that the adjustment proposed in the *Add-Back Notice* would turn an otherwise one-time adjustment to the price cap indices of a LEC that has incurred a sharing obligation into a continuing responsibility running over the course of multiple years.[14] U S West contends that the concept of sharing is similar to a productivity dividend in that the impact of a sharing obligation results in a one-time "dividend" subsequent to productivity gains in a prior year. On the other hand, says U S West,

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[8] Price Cap Regulation of Local Exchange Carriers, Rate of Return Sharing And Lower Formula Adjustment, Notice of Proposed Rulemaking, 8 FCC Rcd 4415, 4417 (1993) (*Add-Back Notice*).

[9] *Id.*

[10] MCI Petition at 17-19 and Exhibit II.

[11] *Id.*

[12] Allnet Petition at 4, *citing*, 1993 Annual Access Tariff Filings, 8 FCC Rcd 4960, 4973 (Com. Car. Bur. 1993) (*1993 Annual Access Order*).

[13] Bell Atlantic Reply at 7; U S West Reply at 6.

[14] *Id.*

an adjustment to offset sharing would "artificially inflate the current period earnings."[15]

8. Bell Atlantic, BellSouth, and GTOC argue that implementation of a sharing add-back can be accomplished only by a rulemaking and not in the context of this annual access proceeding.[16] Some LECs state that, even if the Commission does adopt an add-back rule, it cannot apply that rule to the instant access filings because it would be an unlawful retroactive application of a substantive rule change.[17] In addition, Ameritech cites its comments on this issue that it filed in the investigation initiated in the *1993 Annual Access Order*. Southwestern Bell contends that it has not incurred any sharing obligations in the prior years, so the add-back issue is irrelevant to its tariff.[18]

9. **(2) Lower end adjustment issues**. MCI contends that because the sharing obligation and the lower end adjustment represent "two very distinct and different matters," an add-back adjustment should be made only if sharing occurred, not if a lower end adjustment was made.[19] MCI claims that while an add-back mechanism to offset sharing is necessary to adjust a LEC's current year earnings to reflect the actual rate-of-return absent the sharing obligation, the lower end adjustment is nothing more than a rate increase.[20] MCI argues that requiring an adjustment to offset the lower end adjustment inappropriately results in the exclusion of associated revenues from the earnings calculations. According to MCI, the lower end adjustment entitles a LEC to an automatic rate increase when its earnings fall below the prescribed rate of return floor during a given year, while the subsequent adjustment to offset the increase would simply result in an apparent decrease in revenues used to calculate the LEC's earnings equivalent to the prior-year automatic rate increase.[21] MCI asserts that the tariff filed by NYNEX should be suspended and investigated because it makes an adjustment to NYNEX's 1993 earnings that

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[15] U S West Reply at 6.

[16] Bell Atlantic Reply at 7; BellSouth Reply at 6-7, *citing Add-Back Notice*; GTOC Reply at 2.

[17] BellSouth Reply at 6-7 (indicating that any present decision to require a sharing add-back could be applied only prospectively and impact only those rates to become effective on July 1, 1995, at the earliest); U S West Reply at 6 n.11, *citing* Bowen v. Georgetown Univ. Hospital, 109 S.Ct. 468, 471-72 (1988).

[18] Ameritech Reply at 3; Southwestern Bell Reply at 5 n.15.

[19] MCI Petition at 6-7.

[20] *Id.*

[21] *Id.* at 7-12.

excludes NYNEX's lower end revenues from its earnings calculations.[22]

10. AT&T argues that both NYNEX and SNET have improperly included an adjustment to offset their 1993 lower end adjustments, which has the effect of removing approximately $15.9 million from NYNEX's current sharing obligation, and reducing SNET's rate of return by 0.81 percent (to 11.39 percent).[23] AT&T reasons that because the Bureau suspended and investigated the NYNEX and SNET tariffs in response to AT&T's similar claim in the *1993 Annual Access Order* and the Commission initiated the rulemaking to address add-back issues, the Bureau should suspend and investigate the proposed NYNEX and SNET tariffs for one day, impose an accounting order, and incorporate those tariffs into the Commission's pending proceedings concerning these LECs' earnings adjustments.[24]

11. In its reply, NYNEX incorporates by reference its pleadings filed in the investigation of the 1993 access tariffs relating to the lower end adjustment add-back issue. NYNEX maintains that those pleadings demonstrate that LECs must normalize their rate-of-return reports by adding back sharing revenues and removing lower end adjustment revenues in order to comply with earnings limitations of the price cap system and the Commission's rules regarding Form 492.[25] SNET also incorporates by reference its pleadings in last year's investigation proceeding, and contends that AT&T and MCI err in claiming that it has improperly adjusted its rate of return by subtracting the impact of its lower end adjustment from its earnings.[26] SNET maintains that AT&T and MCI continue to ignore the fact that the Commission adopted the lower end adjustment in order to ensure that LEC earnings were not so low as to be confiscatory and to enable companies to continue to attract capital and maintain services.[27] SNET concludes that failure to offset a lower end adjustment "would create an artificially high earnings level as the basis for applying the Commission's sharing/lower formula earnings test."[28]

(c) Discussion

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[22] *Id.* at 13-16.

[23] AT&T Petition at 9 and Appendix B.

[24] *Id.* at 10-11.

[25] NYNEX Reply at 4.

[26] SNET Reply at 2 n.4, *citing* SNET Reply to Comments (filed May 10, 1993); SNET Direct Case (filed on July 7, 1993); SNET Rebuttal (filed Sept. 10, 1993), in CC Docket 93-193.

[27] SNET Reply at 3.

[28] *Id.*

12. In the *1993 Annual Access Order*, the Bureau suspended for one day the tariffs of those LECs that had a sharing or lower end adjustment in 1992, and set those tariffs for investigation, subject to an accounting order.[29] The issue under investigation in that proceeding is how price cap LECs should reflect amounts reflecting prior year sharing or lower end adjustments in computing their rates of return to determine the current year's sharing obligation and permissible lower end adjustments to the price cap indices.[30] Allnet, AT&T and MCI now advance essentially the same arguments with respect to the LECs that implemented a sharing or lower end adjustment in 1993. The arguments made by the LECs in their replies are also essentially the same as those made by the LECs participating in the 1993 investigation. Because of the similarity of the "add-back" issues raised in both access filings, we are including the 1994 access transmittals in that investigation. In addition, as discussed above, the Commission has a pending rulemaking in which it has proposed to require LECs incurring a sharing obligation or lower end adjustment in a prior year to adjust their earnings calculations in the following years to remove the effects of the prior-year sharing obligation or lower end adjustment.[31] We therefore suspend the tariffs of all LECs that implemented a sharing or lower end adjustment last year and incorporate them into the Commission's pending investigation in CC Docket 93-193.[32] These transmittals are subject to the accounting order in CC Docket No. 93-193. After the termination of the 1993 investigation and prior to the termination of this investigation, we will give parties an opportunity to present any legal argument or factual circumstances that would lead us to conclude that the decisions reached in CC Docket No. 93-193 on add-back issues should not control our treatment of the 1994 access transmittals.

2. Omission of Subscriber Line Revenues from Common Line Basket for Sharing Purposes

(a) Background

13. The *LEC Price Cap Order* requires that the sharing obligation to be reflected in the PCI for each basket on a cost-causative basis.[33] In implementing this requirement, the *1992 Annual Access Order* required carriers to allocate sharing obligations on a cost-causative basis and found that basket revenues can be used as a proxy for basket costs in all baskets. That Order also concluded that allocating sharing obligations based on basket revenues most closely comports with the Commission's price cap goals of moving away from cost allocation systems

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[29] 8 FCC Rcd at 4965.

[30] *Id.* at 4973.

[31] *See* n.8 *supra*.

[32] *1993 Annual Access Order*, 8 FCC Rcd at 4965, 4973-75.

[33] *LEC Price Cap Order*, 5 FCC Rcd at 6805.

and instead focusing on prices.[34] Thus, for purposes of calculating the sharing amount to be allocated to the common line basket on a cost-causative basis, common line revenues may be used as a surrogate for common line costs. In the 1993 annual access tariffs, the Bureau designated for investigation the issue of whether Bell Atlantic should be permitted to exclude end user common line charge revenues when it computes the sharing obligation to be apportioned to the common line basket. [35]

(b) Contentions of the Parties

14. AT&T argues that Bell Atlantic has impermissibly failed to include its subscriber line revenues in the base period common line basket when it computed the adjustment to that basket's PCI required by its 1993 sharing obligation and thus has not allocated its sharing adjustment among all price cap baskets on a cost-causative basis.[36] AT&T asserts that using the correct revenue amounts would result in a substantial change to Bell Atlantic's sharing allocations.[37] AT&T notes that Bell Atlantic used a similar approach last year, which caused the Bureau to suspend and investigate Bell Atlantic's 1993 access filing.[38] Allnet also contends that Bell Atlantic has incorrectly omitted subscriber line revenues from its common line basket.[39] Allnet and AT&T both ask the Commission to impose an accounting order and to require Bell Atlantic to reallocate its 1993 sharing amounts in accordance with the price cap rules.[40]

15. Bell Atlantic replies that the exclusion of its subscriber line charge revenues from sharing is proper because those rates are not calculated under the Commission's price cap

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[34] 1992 Annual Access Tariff Filings, CC Docket No. 92-141, 7 FCC Rcd 4731, 4732-33 (Com. Car. Bur. 1992) (*1992 Annual Access Order*).

[35] *1993 Annual Access Order*, 8 FCC Rcd at 4966

[36] AT&T Petition at 11-12, *citing 1992 Annual Access Order*, 7 FCC Rcd at 4732-33.

[37] According to AT&T, Bell Atlantic's reported common line sharing allocation is 24 percent or $14.633 million, but the correct common line sharing allocation should be 47 percent or $28.404 million. AT&T states that the failure to include subscriber line revenues causes an understatement of Bell Atlantic's common line basket revenues of $13.771 million. AT&T Petition at 12 and Appendix C.

[38] AT&T Petition at 11 n.18, *citing 1993 Annual Access Order*, 8 FCC Rcd at 4966, 4973-74.

[39] Allnet Petition at 3.

[40] *Id.* at 3-4; AT&T Petition at 11 n.8, *citing* Commission Requirements for Cost Support Material To Be Filed with 1993 Annual Access Tariffs, 8 FCC Rcd 4960, 4973-74 (Com. Car. Bur. 1993) (*1993 TRP Order*).

regulatory scheme and are not affected by the sharing amount.[41] Bell Atlantic asserts that the objections of AT&T and Allnet only involve the issue of how the sharing amount should be allocated and do not concern the amount of revenues that must be shared.[42]

(c) Discussion

16. The issue of excluding subscriber line revenues from the computation that allocates the sharing obligation among different baskets is the same issue that is before us in our investigation of the 1993 annual access tariff filings. Because of administrative convenience we add Bell Atlantic's transmittal to that investigation. We therefore suspend Bell Atlantic's tariff for one day and incorporate it into the Commission's investigation of the exclusion of subscriber line revenues for sharing purposes in CC Docket No. 93-193.[43] Bell Atlantic's transmittal is also subject to the accounting order in CC Docket No. 93-193.

3. Reversal of Sharing

(a) Background

17. Under the Commission's price cap rules, a sharing obligation requires a one-time adjustment to the affected carrier's PCI. Accordingly, after a carrier has fully met its sharing obligation, it must "reverse" the effect on the PCI in order to restore the status quo. The adjustment needed to accomplish this should differ from the amount original sharing adjustment by the percentage change in basket revenues ("R") from calendar year 1992 to calendar year 1993.[44] Thus, if revenues increase between 1992 and 1993, the adjustment made in the

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[41] Bell Atlantic Reply at 8 n.25, *citing* Bell Atlantic Opposition, 1993 Annual Access Tariff Filings, at 11-12 (filed May 10, 1993); Bell Atlantic Direct Case, CC Docket 93-193, at 9-11 (filed July 27, 1993).

[42] *Id.*

[43] *1993 Annual Access Order*, 8 FCC Rcd at 4966, 4973-75.

[44] The Bureau explained how the reversal was to be achieved in the *1994 TRP Order*, stating that

> Because "R," the variable in the PCI formula that equals base period demand multiplied by rates, has changed since the 1993 annual access filings, the amount displayed for the removal of sharing or low end adjustment will not match the original sharing or low end adjustment reported in the 1993 TRP. The amount of the removal should differ from the original sharing or low end adjustment by the percent change in "R" between the 1993 and 1994 annual filings.

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calculations to the 1994 PCI to offset the 1993 sharing adjustment would be greater than the sharing adjustment to reflect that revenue growth. On the other hand, if revenues decreased from 1992 to 1993, the former adjustment would be reduced to reflect that decline. This procedure ensures that the percentage adjustment to the PCI equals the percentage adjustment caused by the original sharing amount.

(b) Contentions of the Parties

18. Sprint argues that the percentage change in "R" required to offset U S West's 1992 sharing obligation as computed by U S West is too high because it used prior year (1992) revenues that are lower than the 1992 revenues reported in their 1993 annual access filings. Because the change in "R" equals 1993 revenues divided by 1992 revenues, argues Sprint, the change in "R" as computed by U S West is overstated. According to Sprint, the overstatement has the effect of allowing U S West to include exogenous cost increases for the reversal amounts which significantly exceed the original sharing amounts.[45]

19. U S West replies that it correctly calculated the exogenous cost of reversing its sharing adjustment in accordance with Section 61.45(c) of the rules, 47 C.F.R. § 61.45(c).[46] The *1993 TRP Order* indicates that adjustments to offset the sharing adjustment should differ from the original sharing adjustment by the percentage change in "R" between the 1993 and 1994 annual access filings. U S West asserts that it used the "R" values contained in its 1993 annual access filing[47] and the "R" values for the 1994 annual access filing[48] to calculate the exogenous cost adjustment needed to offset its 1993 sharing adjustment.[49] U S West contends that Sprint's proposed method of calculating "R" is inconsistent with Section 61.45(c) and the *1994 TRP Order*.[50] Subsequent to its reply, U S West filed an amendment to its transmittal to correct the R values used to calculate the reversal of sharing.[51]

Tariffs and for Other Cost Support Material, 9 FCC Rcd 1060, 1063 n.29 (Com. Car. Bur. 1994) (*1994 TRP Order*).

[45] Sprint Petition at 5.

[46] U S West Reply at 10-11.

[47] US West Transmittal No. 345, Section 1, Workpaper 5, Line 11.

[48] U S West Transmittal No. 465, TRP Form PCI-1, Row 160.

[49] U S West Reply at 11.

[50] *Id.* at 12 and Attachment C.

[51] U S West Transmittal No. 472 - Amended, Workpaper 1, at 1 (filed June 10, 1994).

(c) Discussion

20. We have reviewed the amendment made by U S West to adjust its "R" amounts to assure that its 1994 PCIs are correctly calculated. We conclude that these amendments adequately address the problem raised by Sprint with regard to removing the sharing adjustment made to the 1993 PCIs before calculating its 1994 PCIs. We find that U S West has included the correct R amounts in this calculation. Therefore, we see no need to investigate this issue.

4. Discrepancies Between NYNEX Revenues Reported in Revised Form 492A and in ARMIS Report 43-01

(a) Background

21. In Form 492A, LECs derive the revenue figure that is the basis for determining whether they have incurred a sharing obligation or are permitted to implement a lower end adjustment. NYNEX included in its annual filing an updated Form 492A report, which includes the revenue figures it used to calculate its 1994 sharing adjustment.[52] NYNEX has subsequently made several revisions to its 1994 access tariff filing, including revisions to its sharing obligation, based on a further updated Form 492A.[53] The further updated Form 492A contains a $16.0 million reduction in reporting period revenues to account for out-of-period adjustments relating to the New York study area.[54]

(b) Contentions of the Parties

22. AT&T objects to NYNEX's tariff revisions on the grounds that NYNEX has understated the amount of its sharing obligation under Section 61.45(d)(2) of the Commission's rules, 47 C.F.R. § 61.45(d)(2), by $25.391 million.[55] AT&T argues that there is a "significant discrepancy" between the revenues reported in NYNEX's revised Form 492A and those reported in its fourth quarter ARMIS report.[56] In its reply, NYNEX stated that it intended to file revisions to its ARMIS reports to correct the discrepancy between the revenues reported in

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[52] NYNEX D&J, at 39-40.

[53] NYNEX Tariff F.C.C. No. 1, Transmittal No. 294 - Revisions (filed Apr. 28, 1994).

[54] According to NYNEX, the $16.0 million consists of: (1) $10.8 million for services that were performed in the 1992 period, such as backbilling adjustments to carriers' bills; (2) $4.5 million for reversal of an accrued liability relating to the special access investigation in CC Docket No. 85-166; and (3) $0.7 million relating to the 1991 period for corridor adjustments with New Jersey Bell and other miscellaneous billing adjustments. *Id.*

[55] AT&T Petition at 1.

[56] *Id.* at 2.

ARMIS and those reported in the most recently updated Form 492A.[57] On June 16, 1994, NYNEX filed the revisions to its ARMIS reports.[58]

(c) Discussion

23. We find that NYNEX's revised Form 492A now is consistent with its revised ARMIS reports, and that AT&T's concern regarding discrepancies between NYNEX's reported revenues has been adequately addressed. Accordingly, we do not designate this issue for investigation.

B. Transport Service Issues

1. DS3-to-DS1 Transport Rate Ratios

(a) Background

24. Transport is a component of the LECs' interstate switched access service that enables IXCs and other customers to originate and terminate interstate switched telecommunications traffic. Transport refers to the local transmission service between customer points of presence (POPs) and LEC end offices, at which local switching occurs.[59] In its transport rate structure and pricing rulemaking proceeding, the Commission adopted interim rules that restructured the LECs' transport rate structure.[60] In their comments in that proceeding, small and medium IXCs asked the Commission to require LECs to maintain a prescribed ratio between DS1 and DS3 transport rates. The Commission decided to require a DS3-to-DS1 rate relationship only for initial transport rates.[61]

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[57] NYNEX Reply at 3.

[58] Letter from Director, Federal Regulatory Affairs, NYNEX, to Secretary, Federal Communications Commission (June 16, 1994) (revising ARMIS Reports 43-01, Quarterly Report, 43-03, Joint Cost Report and 43-04).

[59] Transport Rate Structure and Pricing, Second Report and Order, 9 FCC Rcd 615, 616 n.1 (*Transport Second Report and Order*) (1994).

[60] Transport Rate Structure and Pricing, Report and Order, and Further Notice of Proposed Rulemaking, 7 FCC Rcd 7006, 7029-31 (1992) (*Transport Order*), *recon.* First Memorandum Opinion and Order on Reconsideration, 8 FCC Rcd 5370 (1993) (*First Reconsideration Order*), *recon.*, Second Memorandum Opinion and Order on Reconsideration, FCC 93-403 (released Aug. 18, 1993) (*Second Reconsideration Order*), *pets. for recon. pending, appeal dismissed sub nom.* New England Tel. and Tel. Co. v. FCC, No. 93-1494 (D.C. Cir. Sept. 7, 1993), *pet. for review pending sub nom.* Full Service Computing Corp. v. FCC, No. 93-1670 (D.C. Cir., filed Oct. 4, 1993).

[61] *Id.* at 7032-34.

25. Specifically, the Commission concluded that if the ratio of initial DS3 to DS1 transport rates greater than a benchmark ratio of 9.6-to-1, the rates would be presumed reasonable and generally be allowed to become effective without suspension and investigation.[62] When the Commission subsequently proposed to establish the new trunking basket that would include transport rates, small and medium IXCs renewed their proposals that the Commission suspend and investigate DS3 and DS1 transport rates if their ratio did not exceed a prescribed benchmark ratio.[63] The Commission rejected these proposals, finding that the maintenance of the proposed DS3-to-DS1 benchmark ratio would unnecessarily discourage LECs from lowering their DS3 and DS1 rates.[64]

(b) Contentions of the Parties

26. Sprint contends that, although no rule prohibits LECs from lowering DS3 transport rates so that the DS3-to-DS1 ratio falls below the initial DS3-to-DS1 benchmark of 9.6-to-1, U S West, Southwestern Bell, and BellSouth propose transport rates that will "enable them to move further and further away from cost-based rates and to skew IXC competition."[65] According to Sprint, these carriers propose to change their current DS3-to-DS1 ratios as follows: (1) US West from 9.66-to-1 to 9.21-to-1; (2) Southwestern Bell from 12.27-to-1 to 12.10-to-1; and (3) BellSouth from 15.27-to-1 to 14.15-to-1.[66] Sprint maintains that the 9.6-to-1 benchmark ratio for comparing initial DS3-to-DS1 transport rates, which the Commission deemed to produce presumptively lawful rates, is "far too low and not reflective of underlying costs.[67] Sprint further claims that because AT&T by virtue of its size is able to use proportionally more DS3 access than other IXCs allowing the BOCs to charge DS3 transport rates that are too low relative to DS1 transport rates gives AT&T cost advantage over medium and small IXCs.[68]

27. In their replies, the LECs note that the Commission has already rejected proposals to mandate a continuing DS3-to-DS1 rate relationship and has required a 9.6-to-1 DS3-to-DS1

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[62] *Id. See also* 47 C.F.R. § 69.108.

[63] *Transport Second Report and Order,* 9 FCC Rcd at 621-22.

[64] *Id.* at 623.

[65] Sprint Petition at 3.

[66] *Id.*

[67] *Id.* at 2, *citing Transport Order*, 7 FCC Rcd at 7034.

[68] Sprint Petition at 2-3.

benchmark with respect to initial transport rates only.[69] BellSouth and Southwestern Bell further note that, even if the 9.6-to-1 benchmark for initial transport rates did apply to their proposed rates, they are still well above that benchmark.[70] BellSouth concludes that, its proposed rate changes are within the service band and below the price cap and, accordingly, there is no basis for rejection or suspension and investigation of those changes.[71]

28. U S West also opposes Sprint's assertion that the reduction of its DS3-to-DS1 ratio is inappropriate and observes that Sprint made similar proposals for a DS3-to-DS1 benchmark ratio for ongoing transport rates in previous proceedings.[72] U S West asserts that the Commission rejected Sprint's prior proposals because establishing a benchmark that requires LECs to lower DS1 rates whenever they lower DS3 rates would deter LECs from lowering DS3 rates, and possibly DS1 rates.[73] U S West further contends that the Commission concluded that the deterrent effect of an ongoing rate benchmark would "retard long-distance price reductions, depress telecommunications usage, and ultimately restrict economic growth."[74] U S West concludes that, while the Commission chose a 9.6-to-1 benchmark for the initial restructured transport rates, it recognized that LECs required flexibility to price their DS1 and DS3 rates in response to marketplace forces.[75]

(c) Discussion

29. As the LECs correctly assert and Sprint concedes, the Commission's interim transport rules do not require the LECs to maintain a benchmark relationship between ongoing DS3 and DS1 rates. Further, the DS3 and DS1 transport rates proposed by the LECs in question are below their applicable price cap indices and within the appropriate service bands. Under the circumstances, we conclude that Sprint has failed to show that the DS3 and DS1 transport rates proposed by BellSouth, Southwestern Bell, and U S West are patently unlawful and has failed to raise any question regarding these rates that warrants investigation at this time.

2. Tandem-Switched Transport and Direct-Trunked Transport Rates

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[69] BellSouth Reply at 11 nn.24-25, *citing Transport Order*, 7 FCC Rcd 7006; *Transport Second Report and Order*, 9 FCC Rcd 615. U S West Reply at 9-10.

[70] BellSouth Reply at 11-12; Southwestern Bell Reply at 8.

[71] BellSouth Reply at 11-12.

[72] U S West Reply at 9-10.

[73] *Id.* at 9-10 nn.18,19, *citing Transport Second Report and Order*, 9 FCC Rcd at 623.

[74] *Id.*

[75] U S West Reply at 10.

(a) Background

30. In the *Transport Order*, the Commission adopted an interim transport rate structure consisting of flat-rate charges for entrance facilities, direct-trunked transport, dedicated signalling transport and per-minute charges for tandem-switched transport and the interconnection charge.[76] The Commission also generally required LECs to set initial rates for entrance facilities, direct-trunked transport, dedicated signalling transport, and tandem-switched transport on the basis of special access rates, and to establish the initial interconnection charge on a residual basis.[77]

31. Direct-trunked transport (DTT) service involves the transmission of traffic between the LEC serving wire center (SWC) and a LEC end office, or between any two customer-designated LEC offices, that does not require tandem switching.[78] Tandem-switched transport (TST) involves the transmission of traffic between the SWC and an end office, or between a tandem office and an end office, that is switched at a tandem.[79]

(b) Contentions of the Parties

32. Comptel argues that BellSouth, NYNEX, and Southwestern have increased their TST interoffice rates relative to their DS1 and DS3 DTT interoffice rates.[80] Comptel maintains that these LECs are effectively shifting a disproportionate amount of network costs on TST users whose traffic volumes are not high enough to justify the use of DTT services, and who lack feasible marketplace alternatives to TST.[81] According to Comptel, these LECs have "decoupled" TST rates from the underlying DS1 and DS3 rates and completely ignored the copper-to-fiber ratio, resulting in an additional cost to TST users of $8 million.[82]

33. Comptel is particularly concerned that U S West has significantly increased its TST interoffice revenues in the 0-50 mileage bands while offsetting those increases with a five percent decrease in the over-50 mileage band. Comptel explains that, unlike large IXCs, third-tier IXCs

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[76] *Transport Order*, 7 FCC Rcd at 7043-44.

[77] *Id.*

[78] *Transport Second Report and Order*, 9 FCC Rcd at 618 n.7.

[79] *Id.*

[80] Comptel Petition at 3, *citing* Comptel Reply Comments, CC Docket No. 91-213, at 3, 14, 22 (filed Mar. 19, 1993).

[81] Comptel Petition at 4.

[82] *Id.* at 4-5.

often can afford only the TST option for all mileage categories because they lack the volume necessary to make DTT service a cost-effective option in any mileage band. Comptel claims that U S West's proposal to lower long-haul TST rates and raise short-haul TST rates unreasonably discriminates against small IXCs because the increase in short-haul TST rates disproportionally affects these carriers.[83]

34. In their replies, BellSouth and NYNEX maintain that the Commission specifically decided in establishing the transport rules that the DTT and TST rates would be set in accordance with the rules governing price cap indices and service band indices.[84] Southwestern Bell asserts that the Commission restricted pricing flexibility of LECs for transport services by establishing several service categories and banding limitations of plus-2 and minus-5 percent for the TST service category.[85] BellSouth, NYNEX and Southwestern argue that the Commission does not require any direct linkage or benchmark ratio for DTT and TST rates.[86] These carriers conclude that there is no basis for rejection or suspension of their tariffs because the proposed DTT and TST rates are below the price cap and within the appropriate service bands.[87]

35. U S West replies that Comptel's objections to the proposed short-haul TST rates are groundless because the overall impact of its proposed changes in all mileage bands for TST and DTT is revenue neutral.[88] U S West asserts that Comptel's display of percentage revenue change in its petition is misleading because it is based upon a combination of fixed and variable revenues, not rates. U S West contends that revenue impact is caused by differences in demand for each of the various fixed and variable rate elements and has no relevance to changes in rates of various elements.[89] U S West further indicates that it has complied with the price cap rules for local transport rates, and its TST rate changes remain within the required service band limits of plus-2 or minus-5 percent for the Tandem Switched category, within the trunking basket.[90]

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[83] *Id.* at 4-6, *citing,* Comptel Petition for Reconsideration and Clarification, CC Docket No. 91-213, at 10 (filed Dec. 21, 1992).

[84] BellSouth Reply at 11-12; NYNEX Reply at 4-5 n.7, *citing Transport Second Report and Order*, 9 FCC Rcd at 623;

[85] Southwestern Bell Reply at 6-7, *citing Transport Order*, 7 FCC Rcd 7006 (1992).

[86] *See, e.g.,* NYNEX Reply at 4-5; Southwestern Bell Reply at 6.

[87] BellSouth Reply at 11-12; NYNEX Reply at 4-5; Southwestern Bell Reply at 6-7.

[88] U S West Reply at 8.

[89] *Id.* at 9.

[90] *Id.*

(c) Discussion

36. As the LECs correctly assert, the Commission does not prescribe a specific rate relationship between the TST and DTT service categories, and provides pricing flexibility for TST rates within the specified service band.[91] Furthermore, all of the TST rates and DTT rates proposed by the LECs are below the applicable price cap index and within the governing service bands. Accordingly, we conclude that Comptel has failed to demonstrate that the TST and DTT transport rates proposed by BellSouth, NYNEX, Southwestern Bell and U S West are patently unlawful, or to raise any issue that warrants investigation of these rates at this time.

3. Southwestern Bell's Proposed Fixed-Mileage Charge for DS1 Zero-Mile Interoffice Transport Service

(a) Background

37. Southwestern Bell proposes in its 1994 access filing to increase its recurring fixed mileage charge for DS1 circuits with zero miles of interoffice transport from $0.00 to $6.04.[92] The proposed charge appears in the switched transport portion of Southwestern Bell's tariff and would apply to the link between the distribution (DSX) bay and the switch. In its switched access expanded interconnection tariff filing, Southwestern Bell had proposed a DS1 switched connection charge of $6.04 to recover the costs of providing a link between the DSX bay and the switch.[93] Two parties challenged the expanded interconnection charge on the grounds that the costs of the connection were already recovered in Southwestern Bell's switched access rates.[94] Subsequently, Southwestern Bell agreed to eliminate the connection charge and cross-referenced a charge set at zero for the DS1 zero-mileage band in the switched transport section of its tariff. The Bureau concluded that this revision eliminated the discrepancy between switched transport and the rates in Southwestern Bell's switched access expanded interconnection tariff and decided not to investigate any further.[95]

(b) Contentions of the Parties

38. MFS maintains that Southwestern Bell's recurring proposed fixed mileage charge

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[91] *Transport Second Report and Order*, 9 FCC Rcd at 629-32.

[92] Southwestern Bell Tariff F.C.C. Nos. 67, 73, Transmittal No. 2344, Index to D&J, Tab 9, at 18.

[93] Local Exchange Carriers' Rates, Terms, and Conditions for Expanded Interconnection for Switched Transport, 9 FCC Rcd 817, 822 n.40 (1994), Erratum, 9 FCC Rcd 1052 (1994).

[94] *Id.*

[95] *Id.*

of $6.04 for DS1 circuits with zero miles of interoffice transport is narrowly targeted to discriminate against collocated CAPs and their customers because Southwestern Bell does not impose such a charge on any other switched transport circuits.[96] MFS reasons that because the vast majority of cross-connects taken through collocation arrangements are at the DS1 level, Southwestern's decision to limit the imposition of the zero-mile charge only to DS1 circuits and to exclude voice grade, analog, and DS3 services, is "clearly targeted to the services most likely to be provided by collocated competitive access providers."[97] MFS also argues that the DS1 zero-mile switched transport charge cannot be justified on cost grounds, and Southwestern Bell has not attempted to do so. Finally, MFS contends that imposing this charge only on DS1 customers and not other Southwestern Bell customers would establish an unjustified preference among classes of customers in violation of Section 202 of the Act, 47 U.S.C. § 202.[98]

39. In its reply, Southwestern Bell asserts that it is not proposing a new structure for the rate element in its annual filing because it always had a placeholder for the fixed-mileage DS1 charge for zero-mile interoffice transport and is merely increasing it from $0.00 to $6.04.[99] Southwestern Bell argues that because the Commission mandated rate parity between the initial DTT and special access rates[100] and its special access DS1 zero mileage fixed rate was $0.00, it was required to set the initial DTT zero mileage fixed rate at the same level.[101] "The proposed filing," says Southwestern Bell, "simply changes the existing DTT zero mileage fixed rate from $0.00 to $6.04."[102] Finally, Southwestern Bell amended its tariff, in response to an informal request from Commission staff, to include the $6.04 switched transport charge in the expanded interconnection portion of its tariff, as well as the switched transport portion of the tariff.[103]

(c) Discussion

40. Based on our review of Southwestern Bell's Transmittal No. 2344, as amended, and MFS's petition, we believe that Southwestern Bell has sufficiently addressed MFS's concerns regarding the DS1 switched transport portion of the proposed $6.04 charge for a link between

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[96] MFS Petition at 2.

[97] *Id.*

[98] *Id.*

[99] Southwestern Bell Reply at 8.

[100] *Id.* at n.24, *citing First Reconsideration Order*, 8 FCC Rcd at 5375.

[101] *Id.* at 8-9.

[102] *Id.*

[103] *See* Transmittal No. 2364, (filed June 22, 1994).

the DSX bay and the switch. The Southwestern Bell $6.04 charge is below the applicable price cap indices and within the service bands. Nevertheless, we are concerned that Southwestern Bell's proposal may result in a double recovery by reason of its potentially being able to collect the $6.04 charge from a customer twice -- through the DTT charge for transmission between the DSX bay and the switch and again through the residual interconnection charges (RICs).[104] We, therefore, conclude that Southwestern Bell's proposed fixed mileage charge for DS1 services with zero-miles of interoffice transport warrants investigation, and we will incorporate it into the Commissions' ongoing expanded interconnection investigation.[105] Accordingly, we suspend the $6.04 rate element in Southwestern Bell's Transmittals No. 2344 and No. 2364 for one day. The accounting order in the expanded interconnection investigation applies to the Southwestern Bell transmittal as well.

4. BellSouth Delta-Y Interexchange Costs

(a) Background

41. LECs that provide "corridor" services[106] between their Local Access Transport Areas (LATAs), or interstate intraLATA services, are required to impute access charges, including the residual interconnection charge, to themselves and to include revenues from these charges in their interexchange basket. The delta-Y factor is an exogenous cost adjustment that we require the LECs to make to the PCI to reflect changes in the levels of interstate access rates that they must impute to themselves when they offer such interstate services.[107]

(b) Contentions of the Parties

42. Allnet maintains that BellSouth has excluded the changes to certain access rate elements including the interconnection charge from its calculation of the delta-Y factor through

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[104] *See* Local Exchange Carriers' Rates, Terms and Conditions for Expanded Interconnection for Special Access, CC Docket No. 93-162, 8 FCC Rcd 4589 (Com. Car. Bur. 1993) (*Suspension Order*); Local Exchange Carriers' Rates, Terms and Conditions for Expanded Interconnection for Special Access, CC Docket No. 93-162, 8 FCC Rcd 6909 (Com. Car. Bur. 1993) (*Designation Order*).

[105] *Id.*

[106] "Corridor" services are interstate offerings generally found in or between large metropolitan areas. Corridor services are provided by certain BOCs as exceptions to Modification of Final Judgment prohibitions on the BOCs providing interexchange services. *LEC Price Cap Order,* 5 FCC Rcd at 6811-12 n.252

[107] *See LEC Price Cap Order,* 5 FCC Rcd at 6808; *see also* 47 C.F.R. § 61.44(d); Policy and Rules Concerning Rates for Dominant Carriers, Report and Order and Further Notice of Proposed Rulemaking, 4 FCC Rcd 2873, 3026-39 (1989) (AT&T Price Cap Order).

which changes in access charges are imputed to the interexchange basket. Allnet also argues that BellSouth calculated local transport revenue using average revenue-per-minute, when it should have used an average of rate element revenues.[108] Allnet argues that BellSouth's methodology for calculating delta-Y differs from other LECs, produces an exogenous cost adjustment that appears to be greater than the adjustment that would result if it had calculated delta-Y on a per rate element basis as opposed to using an average of all rate elements, and reduces its interexchange rates even further.[109]

43. BellSouth replies that its calculation of delta-Y included all rate elements associated with the provision of access services used for corridor services.[110] BellSouth asserts that its use of "average revenues per minute" to calculate delta-Y is consistent with the methodology it has used to calculate that factor in the past, and the Commission does not require the use of a different methodology.[111] BellSouth further maintains that its calculation of delta-Y using average revenues per minute is correct because this average takes account of switched dedicated transport, TST, and the interconnection charge.[112] Subsequent to its reply, BellSouth amended its transmittal to correct the inadvertent omission of transport rates in developing delta-Y from one of its worksheets.[113]

(c) Discussion

44. We have reviewed BellSouth's transmittal, as amended, and find that it correctly calculates the delta-Y factor. We, therefore, conclude that Allnet has failed to demonstrate that BellSouth's calculation of the delta-Y factor for purposes of imputing access charges to the interexchange basket is patently unlawful. Nor has Allnet raised any question regarding this issue that warrants investigation at this time.

C. Exogenous Cost Issues

1. Exogenous Treatment of Expiration of Equal Access and Network

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[108] Allnet Petition at 5.

[109] *Id. citing* NYNEX D&J at 42, 2-1 Exhibit; Southwestern Bell D&J, at Workpaper 8A-3 (as examples of LECs that allegedly correctly itemized the residual interconnection charge (RIC), and also did not average the revenue impacts as BellSouth did).

[110] BellSouth Reply, at 12.

[111] *Id.*

[112] *Id.*

[113] Letter from BellSouth to the Secretary, Federal Communications Commission (filed June 1, 1994), *amending* BellSouth Tariff F.C.C. No. 1, Transmittal No. 197 (filed April 1, 1994).

Reconfiguration Amortization Program

(a) Background

45. In a companion order to the Modification of Final Judgment (MFJ)[114], the U.S. District Court required AT&T to guarantee the BOCs' recovery of the costs of reconfiguring their networks to provide equal access to interexchange carriers (IXCs). The District Court also directed AT&T and the BOCs to develop a procedure to account for the equal access and network reconfiguration (EANR) costs.[115] In 1985, AT&T and the BOCs petitioned the Commission to approve a plan of accounting for EANR costs. AT&T and the BOCs estimated that the total equal access expenditures would exceed $2.6 billion and would be incurred over a short period of time.[116]

46. The *EANR Order* identified only certain costs that would be treated as equal access costs, including: (1) initial incremental costs for hardware and software related directly to the provision of equal access, and not otherwise required; (2) costs of connecting offices that service competitive IXCs; and (3) costs that have been incurred as a result of bona fide requests for conversion to equal access.[117] The Commission required the BOCs to amortize EANR costs over an eight-year period that would expire on December 31, 1993.[118] The Commission concluded that the establishment of a fixed amortization period with a definite termination point of December 31, 1993, would avoid substantial irregular fluctuations in rates and reduce the administrative burdens of tracking EANR costs.[119]

47. When the Commission established the system of price cap regulation for LECs in 1990, it decided that the costs of conversion to equal access should be treated endogenously.[120]

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[114] United States v. American Tel. & Tel. Co., 552 F. Supp. 131 (D.C. Cir. 1983), *aff'd sub nom.*, Maryland v. United States, 460 U.S. 1001 (1983).

[115] United States v. Western Electric Co., Inc., 569 F. Supp. 1057, 1123 (D.D.C. 1983).

[116] Petitions for Recovery of Equal Access Costs, Memorandum Opinion and Order, FCC 85-628, 50 Fed. Reg. 50,910, 50,913-14 n.16 (1985) (*EANR Order*), *aff'd on recon.*, 1 FCC Rcd 434 (1986) (*EANR Reconsideration Order*).

[117] *EANR Order*, 50 Fed. Reg. at 50,912-13; *see also EANR Reconsideration Order*, 1 FCC Rcd at 437 (rejecting proposals to include equal access costs in the amortization "regardless of whether competition exists or a bona fide request for conversion was received").

[118] *EANR Reconsideration Order,* 1 FCC Rcd at 437.

[119] *Id.*

[120] *LEC Price Cap Order*, 5 FCC Rcd at 6808.

The Commission concluded that according exogenous treatment to equal access costs, whether already incurred[121] or newly arisen, would create perverse incentives for the LECs "to inflate the amounts spent on equal access."[122] In the *LEC Price Cap Reconsideration Order*, the Commission affirmed the decision to treat equal access costs endogenously.[123] In the *1994 TRP Order*, the Bureau rejected AT&T's argument that the expiration of the EANR amortization program should be treated exogenously and should result in a downward adjustment to PCI levels. The Bureau noted that the Commission had rejected in *LEC Price Cap Reconsideration Order* a substantially similar argument raised by MCI.[124]

(b) Petitions

48. MCI and AT&T argue that, since the costs of EANR were fully amortized on December 31, 1993, the LECs should be required to treat the expiration of the EANR amortization as an exogenous adjustment.[125] They maintain that all of the price cap carriers have failed to make adjustments to their price cap indices to reflect the full amortization of their EANR costs.[126] AT&T estimates that total cost to the BOCs of converting their exchanges and end offices to equal access is $1.2 billion.[127]

49. MCI and AT&T both liken expiration of the EANR amortization to expirations of the reserve deficiency amortization (RDA) and inside wire amortization (IWA).[128] AT&T cites, as support for its argument, the concern the Commission expressed in its decision in the *LEC Price Cap Order* to accord exogenous treatment to the RDA, that:[129]

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[121] The Commission had found that the largest price cap LECs had already completed conversion to equal access. *LEC Price Cap Order,* 5 FCC Rcd at 6808.

[122] *Id.*

[123] *LEC Price Cap Reconsideration Order,* 6 FCC Rcd at 2666-67.

[124] *1994 TRP Order*, 9 FCC Rcd at 1063, *citing LEC Price Cap Reconsideration Order*, 6 FCC Rcd at 2666-67 n.77.

[125] MCI Petition at 20-22; AT&T Petition at 4-5.

[126] AT&T Petition at 2-9; MCI Petition at 20-21.

[127] AT&T Petition at 3.

[128] *Id.* at 5-6; MCI Petition at 22-23, *citing LEC Price Cap Order*, 5 FCC Rcd at 6808; *LEC Price Cap Reconsideration Order*, 6 FCC Rcd at 2673-75.

[129] AT&T Petition at 5-6 n.8, *citing LEC Price Cap Order*, 5 FCC Rcd at 6808.

it would be unfair to ratepayers who are now bearing the cost of the amortization program if rates were not adjusted downward at the end of the program.

AT&T further contends that the Commission's decision to treat the expiration of IWA exogenously to effect a reduction in LEC rates "applies with equal force to the expiration of the EANR amortization."[130]

50. MCI maintains that, just as the Commission expected when it established the RDA and IWA that costs would be fully recovered and corresponding rates would decrease at the end of the amortization, the Commission similarly expected, in establishing the EANR amortization, that rates would decrease when the EANR amortization expired.[131] MCI and AT&T conclude that the Commission must accord exogenous treatment to the expiration of the EANR amortization and adjust downward the price cap indices in order to achieve consistency in the treatment of amortizations that were in effect at the time price cap regulation was established.[132]

(c) Replies

51. The LECs contend that AT&T and MCI are in error because the Commission has repeatedly rejected proposals to treat the expiration of the EANR amortization exogenously.[133] They assert that the Commission concluded in the *LEC Price Cap Order*, and affirmed in the *LEC Price Cap Reconsideration Order*, that all equal access costs are to be treated endogenously.[134]

52. Southwestern Bell further argues that MCI is incorrect in contending that the Commission's decision in the *LEC Price Cap Order* to accord endogenous treatment to the costs of equal access conversion is distinguishable from, and did not encompass, the EANR amortization program then in effect.[135] Nowhere in the *LEC Price Cap Order*'s discussion of the exogenous treatment of equal access costs, says Southwestern Bell, is such a limitation

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[130] *Id.*, at 6 n.9, *citing LEC Price Cap Reconsideration Order*, 6 FCC Rcd at 2673-74.

[131] MCI Petition at 23 n.16, *citing EANR Reconsideration Order*, 1 FCC Rcd at 437.

[132] AT&T Petition at 8-9; MCI Petition at 23-24.

[133] Bell Atlantic Reply at 2-3; BellSouth Reply at 2-3; NYNEX Reply at 1-3; SNET Reply at 4; Southwestern Bell Reply at 3-4; U S West Reply at 5, *citing LEC Price Cap Order*, 5 FCC Rcd at 6808, *LEC Price Cap Recon Order*, 6 FCC Rcd at 2667 n.77; *1994 TRP Order*, 9 FCC Rcd at 1063.

[134] *Id.*

[135] Southwestern Bell Reply at 2-3, *citing LEC Price Cap Order*, 5 FCC Rcd at 6808.

found.[136] Several LECs also note that AT&T and MCI falsely assume that all equal access costs have been recovered with the expiration of the EANR amortization because equal access costs continue to be incurred.[137]

53. The LECs also assert that, regardless of the merits of the arguments AT&T and MCI raise, this issue is beyond the scope of the annual access tariff proceeding.[138] Because the existing price cap rules require equal access costs to be treated endogenously, these LECs contend that a change in this treatment could be accomplished only by rulemaking.[139] BellSouth further argues that, even if the existing rules were changed to require exogenous treatment of the costs at issue, any such change would have to be limited to a prospective effect.[140]

(d) Discussion

54. Section 61.45(d) of the Commission's rules, 47 C.F.R. § 61.45(d), restricts the categories of cost changes that price cap LECs are allowed to treat exogenously to those listed and those that the Commission may designate as exogenous. It does not include EANR costs among those listed in the rules as exogenous. Therefore, a plain reading of Section 61.45(d) precludes exogenous treatment of EANR costs. Furthermore, as the LECs correctly note, the Commission concluded in both the *LEC Price Cap Order* and the *LEC Price Cap Reconsideration Order* that all equal access costs are to be treated endogenously.[141]

55. Specifically, in the *LEC Price Cap Reconsideration Order*, the Commission rejected MCI's proposal to treat BOC equal access costs in the same way as the RDA and IWA amortizations and to require a downward adjustment in PCI levels in 1994 to eliminate all equal

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[136] *Id.*

[137] *Id.* at 4-5 (asserting that it has incurred EANR expenditures since the implementation of price cap regulation on January 1, 1991, and continues to incur depreciation expense associated with equal access investments that are not fully depreciated as of January 1, 1994); U S West Reply at 3-4 (stating that equal access costs continue to accrue, but because "it is no longer necessary to account for them separately, they are included in . . . other tariff rate elements").

[138] *See, e.g.*, BellSouth Reply at 3-4; NYNEX Reply at 3.

[139] *Id.*

[140] BellSouth Reply at 3-4.

[141] *LEC Price Cap Order*, 5 FCC Rcd at 6808; *LEC Price Cap Reconsideration Order*, 6 FCC Rcd at 2667 n.77.

access costs.[142] The Commission concluded that there was a "meager factual record presented on the issue of equal access costs" and that the amortization of equal access costs is comparable to changes in depreciation levels that do not require an adjustment to the PCI when the equipment is fully depreciated.[143] As noted above in the *1994 TRP Order*, the Bureau relied on the Commission's prior decision in rejecting AT&T's proposal that the completion of the eight-year EANR amortization be treated exogenously.[144]

56. We believe that exogenous treatment of the EANR amortization would undercut the Commission's goal that the rates permitted under the price cap indices be driven by competition and market economies.[145] The Commission specifically found, in establishing price cap regulation and rejecting exogenous treatment of EANR costs, that:

> For the largest carriers, conversion [to equal access] has been largely completed, and its associated costs are embedded in existing rates. This being the case, there is little need to encourage these LECs to convert to equal access by treating the costs of conversions as exogenous.[146]

In addition, even if the EANR amortization did warrant exogenous treatment, such treatment would require a substantive rule change because Section 61.45(d) does not provide for exogenous treatment of the EANR amortization and no LEC has otherwise petitioned for, and been granted, a waiver of that rule. We therefore conclude that AT&T and MCI have failed to present a question that warrants investigation at this time.

2. Exogenous Treatment of Regulatory Fees

(a) Background

57. The Omnibus Budget Reconciliation Act of 1993 amended the Communications Act of 1934 by adding Section 9. That Section authorizes the Commission to assess and collect annual regulatory fees to recover the costs incurred in carrying out its enforcement activities,

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[142] *LEC Price Cap Reconsideration Order,* 6 FCC Rcd at 2667 n.77.

[143] *Id.*

[144] 9 FCC Rcd at 1063 n.28.

[145] *See, e.g.* Price Cap Performance Review for Local Exchange Carriers, Notice of Proposed Rulemaking, 9 FCC Rcd 1687, 1699 (1994) (proposing that the Commission should "reduce the categories of cost changes eligible for exogenous treatment where this will improve price cap efficiency incentives").

[146] *LEC Price Cap Order,* 5 FCC Rcd at 6808.

policy and rulemaking activities, user information services and international activities.[147] The schedule of fees established by the statute for fiscal year 1994 requires IXCs to pay an annual regulatory fee equal to $60.00 per 1,000 presubscribed access lines, and LECs to pay an annual regulatory fee of $60.00 per 1,000 access lines.[148] The Commission recently adopted regulations to implement the requirements of Section 9.[149]

58. Section 9(f) of the Act requires the Commission to permit payment by installments for regulatory fees in "large amounts."[150] In the *1994 Fees Order*, the Commission defined "large amounts" to be any fees that "are significantly higher than all others" and to allow entities who have to pay "large amounts" to make two "separate and equally divided" payments in fiscal year 1994 instead of paying the entire amount at once.[151] The Commission identified annual regulatory fees in excess of $500,000.00 to be a "large amount" with respect to LEC holding companies, and any annual fee payment in excess of $700,000.00 to be a "large amount" with respect to IXCs.[152] Thus, any LEC holding company or IXC with annual regulatory fees in excess of the specified amounts is allowed to make two equal installment payments under the rules. Bell Atlantic proposes to treat $1.078 million in regulatory fees as an exogenous cost adjustment in its access tariff.[153]

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[147] Pub. L. No. 103-66, Title VI, § 6002(a), 107 Stat. 397 (approved Aug. 10, 1993) (*Budget Act*). New Section 9 of the Communications Act of 1934 is codified at Section 159 of Title 47, United States Code, 47 U.S.C. § 159.

[148] 47 U.S.C. § 159(g). The statute requires the Commission to amend the fee schedule in any year after fiscal year 1994 by proportionate increases or decreases that reflect changes in the amount appropriated for that fiscal year for the performance of the Commission's enforcement, policy and rulemaking, information services and international activities. 47 C.F.R. § 159(b). The government's 1994 fiscal year commenced on October 1, 1993, and ends September 30, 1994.

[149] Implementation of Section 9 of the Communications Act, Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year, Notice of Proposed Rulemaking, MD Docket No. 94-19, FCC 94-46, 59 Fed. Reg. 12,570 (rel. Mar. 11, 1994) (*1994 Fees Notice*); Report and Order, FCC 94-140, MD Docket No. 94-19, 59 Fed. Reg. 30,984 (released June 8, 1994) (*1994 Fees Order*).

[150] 47 U.S.C. § 159(f).

[151] *1994 Fees Order,* at paras. 36-45.

[152] *Id.*

[153] Bell Atlantic Tariff F.C.C. Nos. 1, 2, 3, 4, 5, 8, Transmittal No. 644, Section 8 Workpaper 8-52-1, Row 1 (filed Apr. 1, 1994).

(b) Petitions

59. MCI contends that Bell Atlantic's proposal to increase its price cap indices by $1.078 million to reflect the payment of the new regulatory fee is unwarranted because Section 61.45(d) does not permit exogenous cost treatment for such fees, and Bell Atlantic has not otherwise obtained a waiver.[154] Allnet opposes exogenous treatment of the regulatory fees established by the Budget Act, arguing that they are similar to a tax used to generate funding for Commission operations, and the price cap rules specifically deny exogenous treatment for tax changes.[155]

60. Allnet further contends that even if it is proper to treat these regulatory fees as exogenous, Bell Atlantic still should not be permitted to do so because: (1) the amounts to be assessed are still uncertain, as the Commission has not yet established the cut-off date for determining the number of lines to be used for the derivation of the fees; and (2) the Commission has not yet determined whether they are to be assessed at the operating company level, or holding company level.[156] Sprint argues that the Commission should disallow Bell Atlantic's proposal to include $1.078 million in fees as an exogenous cost because it would be premature to allow exogenous treatment prior to adoption of final rules in the rulemaking initiated by the *1994 Fees Notice*.[157]

(c) Replies

61. Bell Atlantic maintains that it is appropriate to treat exogenously $1.078 million in regulatory fees because the fees are similar to a utility tax, which has already been determined to be an exogenous cost.[158] Bell Atlantic reasons that the Budget Act fees amount to an exogenous cost because: (1) "as a legislated mandate,"[159] they are beyond its control and (2) the fees are "levied exclusively upon telecommunications providers and, therefore, by definition, LECs are 'uniquely or disproportionately' affected."[160]

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[154] MCI Petition at 24. We note that all of the pleadings were filed prior to adoption of the *1994 Fees Order* and thus do not directly address it.

[155] Allnet Petition at 2-3, *citing LEC Price Cap Order*, 5 FCC Rcd at 6808.

[156] *Id.*

[157] Sprint Petition at 4, *citing 1994 Fees Notice*.

[158] Bell Atlantic Reply at 3.

[159] *Id.* at 3 n.9, *citing* 47 U.S.C. § 159(b)(1)(C).

[160] *Id.* at 3-4, *citing LEC Price Cap Order*, 5 FCC Rcd at 6808-09.

62. As support for its assertion, Bell Atlantic cites the Bureau's approval of exogenous treatment for a Pennsylvania realty tax imposed specifically on utilities.[161] Bell Atlantic argues that, because the Budget Act fees apply specifically to LECs, they are even more limited than the tax on all utilities addressed in the *Bell Atlantic Order*.[162] Although NYNEX did not request exogenous treatment of regulatory fees, it agrees with Bell Atlantic that such treatment is warranted. NYNEX contends that LECs may seek exogenous treatment under price caps for "costs triggered by administrative, legislative or judicial action beyond the control of carriers," and the Budget Act's imposition of increased regulatory fees meets that definition.[163]

63. Bell Atlantic further asserts that it is disingenuous for Sprint and Allnet to claim that, even if the fees are exogenous, inclusion in the 1994 annual filings would be premature because the petitioners have failed to show that the LECs are not under an obligation to pay the fees during the tariff year.[164] Bell Atlantic further claims that by "using end-of-year 1993 as the cut-off in its cost estimates," it has chosen "the lowest fee amount."[165] Bell Atlantic contends that exogenous treatment of the regulatory fees is not premature, as Sprint maintains, because the *1994 Fees Notice* "is limited to technical issues such as schedule and method of payment," whereas the "statutory obligation to pay is unquestioned."[166]

(d) Discussion

64. Section 61.45(d) limits the categories of exogenous costs to those listed in the rule and those designated as such by a Commission Order.[167] The regulatory fees at issue are not included among those costs listed as exogenous in Section 61.45(d), nor have they been designated as such in any Commission Order. Therefore, Bell Atlantic's treatment of them as exogenous violates Section 61.45(d) of the rules. Absent a rulemaking, the only means available to Bell Atlantic to obtain exogenous treatment of the regulatory fees is to secure a waiver of

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[161] Bell Atlantic Reply at 4 n.12, *citing* Bell Atlantic Companies Tariff F.C.C. No. 1, 7 FCC Rcd 1486 (Com. Car. Bur. 1992) (*Bell Atlantic Order*).

[162] *Id.*

[163] NYNEX Reply at 5-6.

[164] Bell Atlantic Reply at 4.

[165] *Id.* at 5.

[166] *Id.* at 5 n.16, *citing* Bell Atlantic Tariff F.C.C. Nos. 1, 2, 3, 4, 5, 8, Transmittal No. 644, Section 8 Workpaper 8-52-1, Row 1 (filed Apr. 1, 1994).

[167] 47 C.F.R. § 61.45(d).

Section 61.45(d).[168] Bell Atlantic, however, has not filed a petition seeking waiver of that rule section. Accordingly, we conclude that the Bell Atlantic proposal to treat the regulatory fees exogenously violates our price cap rules and, as such, is patently unlawful. We therefore order Bell Atlantic to recalculate its PCIs in order to reflect endogenous treatment of the regulatory fees required by the Budget Act.

3. Exogenous Treatment of Accounting Changes for Retiree Benefits

(a) Background

65. In December 1990, the Financial Accounting Standards Board (FASB) adopted SFAS-106, which requires companies to account for postretirement benefits other than pensions (other postretirement employee benefits or OPEBs) on an accrual basis beginning December 15, 1992.[169] Prior to that time, companies accounted for OPEBs on a "pay-as-you-go" basis. Under accrual methods, OPEBs are treated as deferred compensation that is earned by employees as they work.[170] In addition, SFAS-106 requires companies to book the previously unaccrued OPEB amount for retirees and active employees as of the date that the company adopts SFAS-106. This amount is called the transitional benefit obligation (TBO).[171]

66. The Bureau subsequently approved the requests of two LECs to adopt SFAS-106 accounting on or before January 1, 1993.[172] The Bureau also directed carriers to use the SFAS-106 option of spreading TBO amounts over prescribed periods of time, in order to avoid the distortion of LEC operating results caused by a one-time inclusion of the TBO amounts.[173] Several price cap LECs subsequently filed tariffs seeking exogenous treatment of OPEBS. The Bureau suspended and investigated these transmittals.[174] In the *OPEB Order*, the Commission

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[168] *See, e.g., 1994 Fees Order*, at n.38; Petition for Waiver of the Commission's Rules to Recover Network Depreciation Costs, 9 FCC Rcd 377 (1993).

[169] *See 1993 Annual Access Order*, 8 FCC Rcd at 4961.

[170] *Id.*

[171] *Id.*

[172] Southwestern Bell Corporation, GTE Service Corporation, Notification of Intent To Adopt Statement of Financial Accounting Standards No. 106, Employer's Accounting for Postretirement Benefits Other Than Pensions, 6 FCC Rcd 7560 (Com. Car. Bur. 1991).

[173] Under this option, LECs could either spread the TBO over a twenty-year period, or over the average remaining service period of active plan participants. *Id.*

[174] Treatment of Local Exchange Carrier Tariffs Implementing Statement of Financial Accounting Standards, "Employers Accounting for Postretirement Benefits Other Than

denied the LECs' request for exogenous treatment of OPEBs, but did not foreclose further consideration of whether to treat the TBO portion of OPEBs exogenously upon a more complete record.[175]

67. Several LECs then sought exogenous treatment of the TBO amounts in their 1993 annual access tariffs.[176] The Bureau suspended these transmittals, and designated for investigation the issue of whether the LECs have borne their burden of demonstrating that implementing SFAS-106 results in an exogenous cost change for the TBO amounts under the Commission's price cap rules.[177] That investigation is now pending before the Commission.

68. In the 1993 access tariffs Ameritech, Bell Atlantic, BellSouth, GTOC, GTSC, NYNEX, Southwestern, and U S West sought exogenous treatment of TBO amounts for the period from July 1, 1993 through June 30, 1994.[178] Bell Atlantic, NYNEX and U S West, however, also sought "retroactive" exogenous treatment for additional TBO amounts for the six-month period preceding the 1993 tariff year -- from January 1, 1993 through July 1, 1993.[179] In their 1994 access tariffs, Bell Atlantic, NYNEX and U S West now propose to adjust their PCIs by an exogenous cost adjustment that would remove the effect on the PCIs of the portion of the TBO amounts claimed in their 1993 access tariffs that represents the six-month "retroactive" period.

(b) Contentions of the Parties

69. Allnet argues that NYNEX, Bell Atlantic, and any other LECs proposing to reverse TBO amounts should base such reversals on the outcome of the Bureau's investigation of the

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Pensions," 7 FCC Rcd 2724 (Com. Car. Bur. 1992).

[175] Treatment of Local Exchange Carrier Tariffs Implementing Statement of Financial Accounting Standards, "Employers Accounting for Postretirement Benefits Other Than Pensions," 8 FCC Rcd 1024, 1037 (1993), *appeal docketed*, Nos. 93-1168, 93-1185, 93-1218 (D.C. Cir., argued May 19, 1994).

[176] Specifically, Ameritech, Bell Atlantic, BellSouth, GTOC, GTSC, Lincoln, NYNEX, Southwestern, and U S West sought exogenous treatment for such costs.

[177] *1993 Annual Access Order,* 8 FCC Rcd at 4965, 4973.

[178] These same LECs include exogenous adjustments for these OPEB amounts in their 1994 access tariffs.

[179] *See, e.g.,* Bell Atlantic D&J, Section 4, at 9-10; NYNEX D&J, at 44-45; U S West D&J, Section 1, at 11-12.

1993 annual access tariffs.[180] Allnet further contends that, if the amounts to be reversed are not correct, the rates proposed by Bell Atlantic and NYNEX may be overstated.[181] MCI maintains that, because the issue of whether to recognize OPEBs as exogenous cost changes is still pending in the OPEB investigation initiated in 1993, we should suspend this year's price cap access filings for at least one day.[182]

70. In its reply, NYNEX concludes that Allnet's and MCI's petitions are procedurally infirm because the exogenous treatment of OPEBs is currently under investigation.[183] NYNEX further argues that because it did not include an exogenous cost increase for OPEBs in its 1994 annual access tariff filing, there is nothing to investigate.[184] Bell Atlantic maintains that it seeks exogenous treatment only for the portion of OPEB TBOs that relates to employees who were already retired on the effective date of its adoption of SFAS-106.[185] Bell Atlantic concludes that it is appropriate to treat these costs exogenously because they constitute a limited expense beyond Bell Atlantic's control and are not already reflected in the price cap formula.[186]

(c) Discussion

71. We believe that it is premature to resolve here the issues of whether the LECs should adjust their PCIs to eliminate the effect of their previous exogenous cost treatment of TBO amounts, and whether they have identified the correct amounts on which to base that adjustment. Resolution must await a final Order disposing of the larger and more fundamental questions regarding exogenous treatment of OPEBs in the CC Docket No. 93-193 investigation.[187] We also find that Allnet raises an important issue as to whether the amounts that

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[180] Allnet Petition at 4.

[181] *Id.*

[182] MCI Petition at 25.

[183] NYNEX Reply at 3-4.

[184] NYNEX notes that if the Commission decides to modify or disallow the 1993 OPEB adjustment, it would comply with that decision by adjusting its PCIs on a prospective basis, and that there is therefore no need to investigate the 1994 tariff filing. NYNEX Reply at 4.

[185] Bell Atlantic Reply at 6.

[186] *Id.* at 6-7, *citing* Opposition of Bell Atlantic Telephone Companies to Petitions To Reject or Suspend and Investigate, Transmittal No. 565, at 2-10 (filed May 10, 1993); Direct Case of Bell Atlantic, *1993 Annual Access Tariff Filings*, CC Docket No. 93-193, at 2-6 (filed July 27, 1993).

[187] *See 1993 Annual Access Order*, 8 FCC Rcd at 4961-65.

the LECs propose to remove from their PCIs are correct. Moreover, Ameritech, Bell Atlantic, BellSouth, GTOC, GTSC, NYNEX, Southwestern, and U S West continue to include TBO amounts in the 1994 annual access filings, as they did in their 1993 tariff filings.[188] Accordingly, because the issues raised by the 1994 tariff filings are substantially similar to those designated for investigation in the *1993 Annual Access Order*,[189] we are suspending for one day the transmittals of the carriers listed in this paragraph based on their claims for exogenous treatment of TBO amounts and proposed reversal of TBO amounts. We are also incorporating the TBO provisions of these carriers' transmittals into the Docket 93-193 investigation and making these transmittals subject to the accounting order imposed in that docket. After the termination of the 1993 investigation and prior to the termination of this investigation, we will give the LECs an opportunity to present any legal argument or factual circumstances that might lead us to conclude that the decisions reached in CC Docket No. 93-193 on TBO issues should not control our treatment of the 1994 access transmittals.

D. Other Issues

1. U S West's Proposed Dark-Fiber Rates

(a) Background

72. "Dark fiber" service is the provision and maintenance of fiber optic transmission capacity between customer premises, with the electronics and other equipment necessary to power or light the fiber provided by the customer, not the LEC.[190] In its 1994 access tariff, U S West proposes to increase its dark fiber rates from $532 per-month per-mile for two fibers to $1,064 per-month per-mile for two fibers.[191]

(b) Contentions of the Parties

73. Wiltel argues that U S West's proposed dark fiber rate is unreasonable and discriminatory in violation of Sections 201 and 202 of the Act, 47 U.S.C. §§ 201, 202, because, while the rate of inflation for 1993 was only 3.2 percent, U S West proposes to increase dark

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[188] *See 1993 Annual Access Order*, 8 FCC Rcd at 4962 n.27 (citing those LECs that claimed exogenous treatment of TBO amounts in their 1993 access tariffs).

[189] 8 FCC Rcd at 4965.

[190] *See* Local Exchange Carriers' Individual Case Basis DS3 Service Offerings, 4 FCC Rcd 8634, 8645 n.7 (1989) (*ICB Order*).

[191] U S West Tariff F.C.C. Nos. 1 and 4, Transmittal No. 465, D&J, Appendix A, at 18.

fiber rates by 100 percent from $532 per month per mile rate for two fibers to $1,064.[192] Wiltel asserts that U S West's other high capacity customers will not be subject to a similarly precipitous increase.[193] Wiltel concludes that, at a minimum, suspension is warranted under Section 1.773 of the Commission's rules, 47 C.F.R. § 1.773. [194]

74. U S West replies that its proposed dark fiber rates are within the service band and below the price cap for these services, as Wiltel recognizes in its petition, and are therefore *prima facie* lawful.[195] U S West also argues that Wiltel has failed to overcome the presumption of lawfulness for below-cap, within-band tariff changes by making the substantial showing required in Section 1.773 of the rules.[196] U S West further notes that the Commission even acknowledged that dark fiber rates would probably increase consistent with price caps in the *Dark Fiber Presubscription Order.* [197]

(c) Discussion

75. We have reviewed U S West's proposed dark fiber rates[198] and all pleadings related to those proposed rates. We conclude that Wiltel has not shown that these rates are patently unlawful or that they warrant investigation at this time.

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[192] Wiltel Petition at 2-3, *citing* CPI Detailed Report, Dec. 1993, 1 (U.S. Dept. of Labor, Bur. of Labor Statistics 1993); American Broadcasting Cos. v. FCC, 663 F.2d 133, 138 (D.C. Cir. 1980); American Tel. & Tel. Co., 67 FCC 2d 1134, 1157-1158, (1978), *recon. denied,* 70 FCC 2d 2031 (1979).

[193] Wiltel Petition at 3. According to Wiltel, U S West's proposed DS3 rates decrease 0.42 percent from the current rates, and the total for high capacity/DDS band rates, which includes the 100 percent increase in dark fiber rates, increases by only 1.44 percent over the current total. *Id.* at n.4, *citing* U S West D&J, at 3-8.

[194] Wiltel Petition at 4-6.

[195] U S West Reply at 12-13.

[196] *Id.* at 13 n.28, *citing LEC Price Cap Order*, 5 FCC Rcd at 6822; *1992 Annual Access Order,* 7 FCC Rcd at 4731, 4736 (Com. Car. Bur. 1992).

[197] U S West Reply at 13-14, *citing* Bell Atlantic Telephone Companies Revisions to Tariff F.C.C. No. 1, BellSouth Telephone Companies Revisions to Tariff F.C.C. No. 4, Southwestern Bell Telephone Company Revisions to Tariff F.C.C. No. 68, U S West Communications Revisions to Tariff F.C.C. No. 1, Memorandum Opinion and Order, 6 FCC Rcd 4891-92 (1991) (*Dark Fiber Presubscription Order*).

[198] U S West Tariff F.C.C. Nos. 1 and 4, Transmittal No. 465, D&J, Appendix A, at 18.

2. Interest on Amounts Reallocated From Regulated to Non-Regulated Accounts

(a) Background

76. Under Section 61.45(d)(1)(v) of the rules, 47 C.F.R. § 61.45(d)(1)(v), price cap LECs are required to make exogenous cost adjustments to their PCIs to reflect the amounts of investment that they have reallocated from regulated to non-regulated accounts. In their 1994 access tariffs, BellSouth and NYNEX include exogenous cost adjustments for investments reallocated from regulated to non-regulated accounts.[199]

(b) Contentions of the Parties

77. According to Sprint, BellSouth and NYNEX have failed to include interest on the reallocated amounts in the exogenous adjustments they made to their PCIs to reflect reallocation of investment from regulated to non-regulated accounts based upon actual 1993 results.[200] Sprint concludes that, as is the case for exogenous adjustments required to meet sharing obligations, the LECs should include interest at 11.25 percent on any reallocated revenue requirement.[201] Sprint further maintains that Ameritech should be required to include calculations to support the assertion made in its transmittal that its reallocation of approximately $123,000 of total company investment during 1993 to non-regulated use does not impact its PCI or rate levels.

78. In their replies, the LECs assert that there is no rule that requires the inclusion of interest in the calculation of exogenous costs to account for reallocation of investment from regulated to non-regulated accounts.[202] BellSouth and NYNEX stress that the rule that governs the reallocations at issue, Section 61.45(d)(1)(v) is silent with respect to any interest requirement.[203] Moreover, BellSouth claims that if the Commission had intended to require the inclusion of interest in such reallocations, it would have made the requirement explicit, as it did in Section 61.45(d)(2), which requires inclusion of interest in calculation of exogenous costs incurred pursuant to sharing adjustments.[204] Ameritech maintains that, contrary to Sprint's purported need for supporting calculations, its $123,000 reallocation does not have any effect

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[199] BellSouth Tariff F.C.C. No. 1, Transmittal No. 197, D&J, at 1-3 and Vol. 2-2, at Tab A; NYNEX Tariff F.C.C. No. 1, Transmittal No. 288, D&J, at 44.

[200] Sprint Petition at 6.

[201] *Id.*

[202] BellSouth Reply at 9-10; NYNEX Reply at 5.

[203] *Id.*

[204] *Id.*

on the levels of price cap indices and rates.[205]

(c) Discussion

79. We have reviewed the procedures followed by the affected LECs to treat as exogenous costs the reallocation of investment from regulated to non-regulated accounts and all related pleadings. As the LECs correctly point out, there is no rule or policy requiring the inclusion of interest in the calculation of these exogenous costs. The rule that governs reallocation from regulated to non-regulated accounts, Section 61.45(d)(1)(v), does not require the inclusion of interest. Moreover, the Commission did not impose any requirement to include interest, or express an intent to establish such a requirement, in concluding that the reallocation of investment from regulated to non-regulated accounts should be treated as an exogenous cost adjustment.[206] We therefore conclude that Sprint has failed to show that the failure of BellSouth and NYNEX to include interest on investment reallocated from regulated to non-regulated accounts is patently unlawful. We also find that Ameritech has demonstrated that its reallocation has no effect on its price cap indices and rate levels,[207] and conclude that the issue raised by Sprint does not warrant investigation at this time.

3. Calculation of the "g" Factor by Bell Atlantic

(a) Background

80. The formula for calculating adjustments to the common line basket price cap indices of LECs is prescribed in Section 61.45(c) of the rules, 47 C.F.R. § 61.45(c). This Section requires, among other things, that LECs calculate the "g" factor, one component of the formula used to compute the new PCI for the common line basket. The "g" factor is defined in Section 61.45(c) as the ratio of minutes of use per access line during the base period to minutes of use per access line during the previous base period, minus one. In its comments to the *1993 Annual*

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[205] Ameritech alleges that after separations approximately 21 percent of the reallocated investment would be removed from the interstate jurisdiction. Ameritech asserts that the exogenous cost adjustment required to reflect this reallocation would be equal to the LEC's authorized rate of return multiplied by the interstate investment amount. According to Ameritech, its assumptions result in the total exogenous cost adjustment in this case amounting to less than $3,000. Although we are not convinced that Ameritech's calculations are correct, we have determined by our own review of Ameritech's filing that its investment reallocation has no effect on its PCIs. Ameritech Reply at 3-4.

[206] *LEC Price Cap Order*, 5 FCC Rcd at 6807-08.

[207] We note that, although we agree with Ameritech's conclusion that the amount of its reallocation to non-regulated accounts has no measurable impact on its PCIs, Ameritech should have presented a more detailed description of its calculation in the supporting documents that accompanied its 1994 annual filing.

Access Order, AT&T alleged that in calculating the "g" factor, SNET and Bell Atlantic had improperly applied the price cap formula in Section 61.45(c) by using a fourth quarter 1992 line count instead of the count for the full calendar year 1992 base period.[208]

(b) Contentions of the Parties

81. AT&T now contends that Bell Atlantic has improperly applied the formula for calculating the "g" factor in the computation of the 1994 PCI for the common line basket. Although the base period for this annual access filing is full calendar year 1993 AT&T argues that Bell Atlantic incorrectly used only a fourth quarter 1993 line count.[209] AT&T contends that according to the Bell Atlantic ARMIS submission the correct line count is 17,759,766. AT&T further claims that use of the correct "g" factor would reduce Bell Atlantic's common line basket PCI by $6.1 million and the carrier common line rate cap by $2.2 million.[210] AT&T concludes that Bell Atlantic should be required to reduce its common line basket PCI and carrier common line rate cap and to file reduced carrier common line rates that conform with these downward adjustments.[211]

82. Bell Atlantic responds that, contrary to AT&T's assertions, its calculation of the "g" factor is correct. AT&T's approach would lead to inconsistent figures and result in an invalid "g" factor, says Bell Atlantic. [212]

(c) Discussion

83. We conclude that Bell Atlantic's calculation of the "g" factor raises a sufficient question of lawfulness to warrant investigation. We also conclude that these issues are sufficiently related to those raised in the investigation initiated by the *1993 Annual Access Order* that administrative convenience would be served by adding this transmittal to that investigation.[213] We therefore suspend Bell Atlantic's calculation of the "g" factor for one day and incorporate it into the Commission's ongoing investigation of Bell Atlantic's "g" factor

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[208] 8 FCC Rcd at 4968.

[209] AT&T Petition at 15.

[210] AT&T asserts that Bell Atlantic's claimed base period access line count is 17,933,242 -- which is identical to the line count reported by Bell Atlantic in its fourth quarter 1993 ARMIS 43-01. AT&T Petition at 15-16.

[211] AT&T Petition at 16.

[212] Bell Atlantic Reply at 8 n.28, *citing* CC Docket 93-193, Bell Atlantic Opposition, at 12 (filed May 10, 1993); Bell Atlantic Direct Case, at 11-13 (filed July 27, 1993).

[213] 8 FCC Rcd at 4968.

calculation filed with its 1993 access tariff. The accounting order imposed in CC Docket No. 93-193 will apply to this transmittal as well.

4. Calculation of Carrier Common Line Rates by BellSouth

(a) Background

84. Section 61.46(d) of the Commission's rules, 47 C.F.R. § 61.46(d), prescribes the method that price cap LECs are to follow in calculating the maximum allowable carrier common line (CCL) charges that they may propose. In the *1994 TRP Order*, the Bureau established the updated "Chart CCL-1," that price cap LECs were to use to display their computations for deriving their maximum CCL rates, including base period CCL and subscriber line charge demand and rates.[214] Chart CCL-1 defines the level of detail that the Bureau requires to verify whether a carrier correctly computed its CCL price cap index.[215] The Bureau further noted that as a general rule:[216]

> Price cap LECs must report all data in the price cap TRP, except rates, in full units of measure with zero decimal places. Individual rates must be reported to the number of decimal places reflected in the company's tariffs. In certain cases, the rates reported on Chart RTE-1 may be aggregate rates, *i.e.*, an average of several rates. In those cases, rates should be displayed to six decimal places.

(b) Contentions of the Parties

85. AT&T argues that BellSouth will overrecover $30,332 in CCL revenues, due to errors in its computation of CCL charges.[217] AT&T concludes that BellSouth should be required to reduce its CCL rates to the corrected levels.

86. In its reply, BellSouth maintains that the discrepancies cited by AT&T stem from BellSouth's decision to round its proposed CCL premium terminating rates to five decimal places. BellSouth argues that no rule specifies that a tariffed rate must be set at six decimal

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[214] 9 FCC Rcd at 1061

[215] *Id.* at 1061-62.

[216] *Id.* at 1061 n.14.

[217] AT&T Petition at 13-14. AT&T alleges that BellSouth reports a correct premium terminating CCL rate in its Chart CCL-1 of $0.017919 per minute, but BellSouth proposes a premium terminating CCL rate of $0.017920 per minute in its tariff.

points as AT&T suggests.[218] BellSouth asserts that the $30,000 difference due to rounding is *de minimis*. BellSouth further asserts that rounding to five digits is warranted because this is the level of rounding reflected in its tariff, and the Bureau directed price cap LECs in the *1994 TRP Order* to report individual rates "to the number of decimal places reflected in the company's tariffs."[219]

(c) Discussion

87. We conclude that AT&T has failed to show that BellSouth's CCL rates contain computation errors. We agree with BellSouth that no Part 69 rule prescribes the number of decimal places to be used in computing tariffed rates. We conclude, therefore, that AT&T has failed to show that BellSouth's CCL rates are patently unlawful or to raise any issue warranting investigation at this time.

5. Error in Bell Atlantic's long-term support contribution

(a) Background

88. Price cap LECs are required, under Section 61.45(d)(iv) of the Commission's rules, 47 C.F.R. § 61.45(d)(iv), to make exogenous cost adjustments to their price cap indices to reflect changes in the NECA Long Term Support (LTS) and Transitional Support (TRS) funds. The Commission created these as part of a comprehensive plan for eliminating the mandatory nationwide CCL pool without endangering the financial viability of small, high-cost telephone companies.[220]

(b) Contentions of the Parties

89. Sprint asserts that Bell Atlantic's estimated decrease of $47,709,938 in its LTS contribution is understated. Sprint contends based on information in the NECA letter specifying

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[218] BellSouth Reply at 7. BellSouth states that the entire rate figure, without rounding is .01791891433874442. BellSouth Reply at 8 n.14, *citing* BellSouth F.C.C. Tariff No. 1, Transmittal No. 197, Chart CCL-1, line 490.

[219] BellSouth Reply at 8 n.15, *citing 1994 TRP Order*, 9 FCC Rcd at 1061 n.14. BellSouth also notes that the rounding it implemented must be acceptable because the required analyzer chart it filed with its 1994 access tariffs (*TRP Analyzer*) did not flag the rate, calculated to five decimal places, as being above cap. *Id.* at n.17, *citing TRP Analyzer*, at 1 of 6.

[220] *See, e.g.*, MTS and WATS Market Structure, Amendment of Part 67 of the Commission's Rules and Establishment of a Joint Board, Recommended Decision and Order, 2 FCC Rcd 2078 (1987), *recon.*, 3 FCC Rcd 4543 (1988) (*Pooling Order*); *LEC Price Cap Order*, 5 FCC Rcd at 6807.

each LEC's LTS obligation, that a typographical error in Bell Atlantic's 1994 access tariff caused Bell Atlantic's July 1994-June 1995 LTS exogenous cost change to be understated by $10,000.[221] Bell Atlantic stated in its reply that it will correct the typographical error relating to its LTS contribution in a subsequent pleading. Bell Atlantic subsequently filed an amendment to its transmittal that corrected the error in its LTS contribution and included workpapers necessary to reflect the corrected LTS amount.[222]

(c) Discussion

90. We find that Bell Atlantic has satisfactorily met Sprint's concerns by correcting the typographical error in its LTS contribution figure. Therefore, there is no reason for the Bureau to take any further action with respect to Bell Atlantic's LTS contribution estimate.

III. RATE OF RETURN CARRIERS

A. Anchorage's Demand Used to Calculate Traffic Sensitive Rates

1. Background

91. Rate of return LECs that elect to file annual access tariffs under Section 61.38 of the Commission's rules, 47 C.F.R. § 61.38, are required by the *1994 TRP Order* to submit cost and demand estimates according to the schedules prescribed in the tariff review plan (TRP) for demand analysis (RORDMD-1) and revenue analysis (RORREV-1).[223] Anchorage included in its 1994 access filing a forecast of demand with these schedules.[224]

2. Contentions of the Parties

92. AT&T alleges that Anchorage used an incorrect demand amount in calculating its traffic-sensitive rates for local switching, residual interconnection, and the information surcharge.[225] Specifically, AT&T contends that the minutes of use (MOUs) Anchorage forecasts in its RORDMD-1 schedule for the period from July 1994 through June 1995 is higher than the

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[221] Sprint Petition at 7, *citing* Bell Atlantic Tariff F.C.C. Nos. 1, 2, 4, 5, 8, Transmittal No. 644, D&J, at Workpaper 8-47.

[222] Bell Atlantic Tariff F.C.C. Nos. 1, 2, 4, 5, 8, Transmittal No. 644 - Amended (filed June 6, 1994).

[223] 9 FCC Rcd at 1064-65.

[224] Anchorage Tariff F.C.C. No. 5, Transmittal No. 80, D&J, at 4-5.

[225] AT&T Petition at 16-17, *citing* Anchorage Telephone Tariff F.C.C. No. 5, Transmittal No. 80, TRP RORDMD-1, at 3; TRP RORREV-1, at 1.

MOUs that it uses in its RORREV-1 schedule to calculate anticipated revenue for the same period.[226] AT&T concludes that the RORDMD-1 schedule appears to be reasonable, and Anchorage should have used the MOUs forecasted there to calculate its local switching, residual interconnection charge, and information surcharge rates.[227] AT&T maintains that use of the total MOUs reported in the RORDMD-1 schedule would decrease Anchorage's estimated revenues for local switching by $383,068, for residual interconnection charge by $90,064, and for the information surcharge by $14,981.[228]

93. Anchorage acknowledges that AT&T correctly identified a clerical error in the MOUs reported in its RORREV-1 schedule, but further contends that AT&T is wrong in assuming that the higher MOU figure reported in the RORDMD-1 schedule is the correct one.[229] Rather, says Anchorage, the lower MOU figure reported in its RORREV-1 schedule is correct. Accordingly, Anchorage filed a subsequent amendment to its annual filing to correct its RORDMD-1 schedule by displaying the corrected MOUs for prospective demand for traffic sensitive rates.[230] Anchorage maintains that monthly monitoring of its rate of return demonstrates a sharp decline in demand in 1993, and asserts that it will adjust its rates to recover only its authorized rate of return "[i]n the unlikely event that demand should exceed all reasonable expectations."[231]

3. Discussion

94. We have reviewed Anchorage Transmittal No. 80, as amended, and AT&T's petition. We believe that Anchorage's amendment eliminates any confusion about the demand Anchorage used to calculate its traffic sensitive rates for local switching, residual interconnection, and the information surcharge. We conclude that AT&T has failed to make a compelling argument that Anchorage's proposed traffic sensitive rates are patently unlawful or that they warrant investigation at this time.

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[226] AT&T avers that Anchorage forecasts 503,277,470 total MOUs in its schedule, but uses a lower 472,523,743 total MOUs in calculating anticipated revenue. *Id.*

[227] According to AT&T, using the RORDMD-1 schedule total MOUs would result in the following rates: $0.011695 (local switching); $0.002744 (residual interconnection); and $0.045737 (information surcharge). AT&T Petition at 17.

[228] AT&T Petition at 17, and Appendix E.

[229] Anchorage Reply at 1-2.

[230] Anchorage Telephone Tariff F.C.C. No. 5, Transmittal No. 80 -- Amended, TRP RORDMD-1, at line 430 (filed May, 31, 1994).

[231] Anchorage Reply at 3.

B. Citizens Telecommunications EUCL Demand and Revenues

1. Background

95. The *1994 TRP Order* provides that rate of return LECs filing their annual access tariffs under Section 61.38 of the rules are required to use a prescribed schedule DMD-3 to submit line counts that demonstrate the projected demand from which their carrier common line (CCL) revenue requirements are derived.[232] Under Section 36.611 of the rules, 47 C.F.R. § 36.611, LECs are required to submit Universal Service Fund data to NECA that includes the number of presubscribed common lines in each of their study areas and the number of those lines associated with each interexchange carrier serving that study area.

2. Contentions of the Parties

96. AT&T contends that Citizens has made two demand calculation errors for the prospective test period that cause an overstatement of its CCL revenue requirement and its CCL charge. AT&T maintains that Citizens has understated its count of residence lines by 24,287, and its business lines by 4,699, resulting in an understatement of its test period EUCL revenues and overstatement of its CCL revenue requirement by $1,356,000.[233] AT&T further alleges that Citizens has understated its CCL demand by failing to explain why the CCL demand for its Tennessee operations is so much lower than its remaining entities or why the prospective demand for Citizens' Tennessee operations does not follow the historical trend for Tennessee specifically.[234]

97. Citizens responds that AT&T erroneously used Universal Service Fund (USF) data to measure Citizen's subscriber line count and reach the conclusion that Citizen's CCL revenue requirement is overstated.[235] Citizens explains that there is no correlation between the DMD-3 chart used to calculate the CCL revenue requirement and the USF loop count, which AT&T used, because the access line count in the DMD-3 chart includes only those lines upon which EUCL charges are paid to Citizens. On the other hand, says Citizens, the USF loop count takes into account all loops, regardless of whether any subscriber line charge is paid, including, FX lines, mobile carrier connecting circuits, and pay telephone lines.[236]

98. Citizens further argues that it is "fallacious and totally at odds with current

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[232] 9 FCC Rcd 1064-65.

[233] AT&T Petition at 18-19.

[234] *Id.* at 19-20.

[235] Citizens Reply at 2-3.

[236] *Id.*

competitive trends in the telecommunications industry" for AT&T to assert that Citizens' reported decline in CCL demand for its Tennessee operations must be wrong because it is not consistent with the patterns shown in Citizens' operations in other states or with the historic pattern of demand growth in Citizens' Tennessee operation.[237] Citizens maintains that the assumption that demand for LEC services can or will continue to increase is erroneous because LECs are no longer immune from competition and competitive forces.[238] Citizens further avers that, even if AT&T's arguments regarding demand flaws in Citizens' filing were meritorious, it is unclear how AT&T's recalculation of Citizens' terminating CCL rate would remedy any such flaws.[239]

3. Discussion

99. We have reviewed Citizens Transmittal No. 4 and AT&T's petition. We believe that Citizens has satisfactorily rebutted AT&T's arguments regarding purported inconsistencies between the DMD-3 and USF demand data. We agree with Citizens that the USF loop counts should not be used to compute CCL rates because they take into account additional loops that are not included in the access line count set forth in the DMD-3 schedule and used to set CCL rates. Although we have minor questions regarding the accuracy of Citizens demand forecast with respect to its Tennessee operations, Citizens nevertheless forecasts demand in the aggregate by pooling all of its study areas.[240] We therefore believe that, in the aggregate, Citizens has sufficiently demonstrated that its demand forecasts, including those for its Tennessee operations, are accurate. We conclude that AT&T has failed to make a compelling argument that Citizens' proposed CCL rates are patently unlawful or that they warrant investigation at this time.

IV. UNIVERSAL SERVICE FUND AND LIFELINE ASSISTANCE RATES

A. Background

100. In 1993, NECA filed a transmittal to make "resizing" adjustments to its charges. Resizing is a mechanism NECA proposed to use to adjust the charges to interexchange carriers to reflect any updates in average loop costs filed by LECs that affected the amounts to be recovered through the Universal Service Fund (USF).[241] In the *USF Order*, the Bureau found

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[237] *Id.* at 4.

[238] *Id.*

[239] *Id.* at 5.

[240] Citizens Transmittal No. 5, D&J, at 5.

[241] National Exchange Carrier Association, Revisions to Tariff F.C.C. No. 5, Transmittal Nos. 518, 527, 530, Universal Service Fund and Lifeline Assistance Rates, 8 FCC Rcd 922, 923 (Com. Car. Bur. 1993) (*USF Order*).

that NECA's resizing proposal appeared to inflate unreasonably the amount of USF payments, suspended the resizing transmittal for one day and initiated an investigation of NECA's USF rate, which is still ongoing.[242] The Bureau subsequently issued an Order designating for investigation issues regarding NECA's USF rates in order to determine whether the USF rate proposed by NECA unreasonably inflated the USF revenue requirement.[243] In the *1993 Annual Access Order*, the Bureau decided to incorporate NECA's 1993 access filing into the ongoing investigation initiated in the *USF Order* because it also raised an issue regarding the resizing adjustment that was sufficiently similar to the issue being investigated.[244]

B. NECA Transmittal No. 612

101. On May 17, 1994, NECA filed Transmittal No. 612 to decrease its monthly USF charge from $0.4408 to $0.4295 per presubscribed line (PSL).[245] Also in this transmittal, NECA proposed to increase its monthly Lifeline Assistance (LA) charge from $0.0841 to $0.0901 per PSL. The proposed rates would result in a net decrease of $0.0053 per PSL per month from the combined rates in effect. No parties protested Transmittal No. 612.

C. Discussion

102. We find that resizing adjustments to the proposed rates raise issues that are sufficiently similar to those in our current investigation of NECA's USF and LA rate changes that administrative convenience would be served by adding this transmittal to that investigation. We therefore suspend NECA's Transmittal No. 612 for one day and incorporate that transmittal into the Commission's ongoing investigation of NECA USF and LA provisions initiated in the *USF Order*. [246] NECA Transmittal No. 612 is also subject to the accounting order imposed in the *USF Order*.

V. PAPERWORK REDUCTION ACT

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[242] *Id.*

[243] National Exchange Carrier Association, Revisions to Tariff F.C.C. No. 5, Transmittal Nos. 518, 527, 530, Universal Service Fund and Lifeline Assistance Rates, 8 FCC Rcd 2930 (Com. Car. Bur. 1993).

[244] 8 FCC Rcd at 4973.

[245] National Exchange Carrier Association, Tariff F.C.C. No. 5, Transmittal No. 612 (filed May 17, 1994).

[246] National Exchange Carrier Association, Revisions to Tariff F.C.C. No. 5, Universal Service Fund and Lifeline Assistance Rates, 8 FCC Rcd 922 (Com. Car. Bur. 1993); Order Designating Issues for Investigation, 8 FCC Rcd 2930 (Com. Car. Bur. 1993).

103. We are not initiating any investigations in this Order. We have analyzed this Order respect to the Paperwork Reduction Act of 1980 and found to contain no new or modified form, information collection, or recordkeeping, labelling, disclosure or other record retention requirements as contemplated under the statute.[247]

VI. ORDERING CLAUSES

105. Accordingly, IT IS ORDERED that, pursuant to Section 204(a), of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions filed by any local exchange carrier that implemented a sharing or lower end adjustment as specified in Section II.A.1(c), *supra,* ARE SUSPENDED for one day, and are subject to the investigation of 1993 Annual Access Tariff Filings instituted in CC Docket No. 93-193. These local exchange carriers SHALL FILE a supplement reflecting this suspension no later than June 29, 1994, to be effective July 1, 1994.

106. IT IS FURTHER ORDERED that, pursuant to Sections 4(i) and 204(a) of the Communications Act of 1934, 47 U.S.C. §§ 154(i), 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, any local exchange carrier that implemented a sharing or lower end adjustment as specified in Section II.A.1(c), *supra*, SHALL KEEP ACCURATE ACCOUNT of all amounts received that are associated with the tariff filings that are subject to the investigation in CC Docket No. 93-193.

107. IT IS FURTHER ORDERED that, pursuant to Section 204(a), of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions filed by the Bell Atlantic Telephone Companies that exclude subscriber line revenues from the computation that allocates the sharing obligation among different baskets as specified in Section II.A.2(c), *supra*, ARE SUSPENDED for one day, and are subject to the investigation of 1993 Annual Access Tariff Filings instituted in CC Docket No. 93-193. The Bell Atlantic Telephone Companies SHALL FILE a supplement reflecting this suspension no later than June 29, 1994, to be effective July 1, 1994.

108. IT IS FURTHER ORDERED that, pursuant to Sections 4(i) and 204(a) of the Communications Act of 1934, 47 U.S.C. §§ 154(i), 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the Bell Atlantic Telephone Companies as specified in Section II.A.2(c), *supra*, SHALL KEEP ACCURATE ACCOUNT of all amounts received that are associated with the tariff filings that are subject to the investigation in CC Docket No. 93-193.

109. IT IS FURTHER ORDERED that, pursuant to Section 204(a), of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions filed by Southwestern Bell Telephone under

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[247] 44 U.S.C. § 3502(4)(A).

Transmittal Nos. 2344 and 2364, that increased the fixed mileage charge for DS1 services with zero miles of interoffice transport as specified in Section II.B.3(c), *supra*, ARE SUSPENDED for one day, and are subject to the investigation in the Expanded Interconnection Tariff Order instituted in CC Docket No. 93-162. Southwestern Bell Telephone SHALL FILE a supplement reflecting this suspension no later than June 29, 1994, to be effective July 1, 1994.

110. IT IS FURTHER ORDERED that, pursuant to Sections 4(i) and 204(a) of the Communications Act of 1934, 47 U.S.C. §§ 154(i), 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, Southwestern Bell Telephone as specified in Section II.B.3(c), *supra*, SHALL KEEP ACCURATE ACCOUNT of all amounts received that are associated with the tariff filings that are subject to the investigation in CC Docket No. 93-162.

111. IT IS FURTHER ORDERED that, pursuant to section 4(i) of the Communications Act of 1934, 47 U.S.C. § 154(i), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions filed by the Bell Atlantic Telephone Companies treating regulatory fees exogenously ARE UNLAWFUL. The Bell Atlantic Telephone Companies SHALL RECALCULATE the relevant indices as specified in Section II.C.2(d), *supra*. The Bell Atlantic Telephone Companies ARE DIRECTED to files these revised indices on June 29, 1994.

112. IT IS FURTHER ORDERED that, pursuant to Section 204(a), of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions including claims for exogenous treatment of OPEB amounts and the proposed reversal of TBO amounts filed by any local exchange carrier as specified in Section II.C.3(c), *supra*, ARE SUSPENDED for one day, and are subject to the investigation of 1993 Annual Access Tariff Filings instituted in CC Docket No. 93-193. These local exchange carriers SHALL FILE a supplement reflecting this suspension no later than June 29, 1994, to be effective July 1, 1994.

113. IT IS FURTHER ORDERED that, pursuant to Sections 4(i) and 204(a) of the Communications Act of 1934, 47 U.S.C. §§ 154(i), 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, any local exchange carrier that who included claims for exogenous treatment of OPEB amounts and the proposed reversal of TBO amounts as specified in Section II.C.3(c), *supra*, SHALL KEEP ACCURATE ACCOUNT of all amounts received that are associated with the tariff filings that are subject to the investigation in CC Docket No. 93-193.

114. IT IS FURTHER ORDERED that, pursuant to Section 204(a), of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions reflecting the calculation of the "g" factor filed by the Bell Atlantic Telephone Companies as specified in Section II.D.3(c) *supra,* ARE SUSPENDED for one day, and are subject to the investigation of 1993 Annual Access Tariff Filings instituted in CC Docket No. 93-193. The Bell Atlantic Telephone Companies SHALL FILE a supplement reflecting this suspension no later than June 29, 1994, to be effective July 1, 1994.

115. IT IS FURTHER ORDERED that, pursuant to Sections 4(i) and 204(a) of the Communications Act of 1934, 47 U.S.C. §§ 154(i), 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the Bell Atlantic Telephone Companies as specified in Section II.D.3(c), *supra*, SHALL KEEP ACCURATE ACCOUNT of all amounts received that are associated with the tariff filings that are subject to the investigation in CC Docket No. 93-193.

116. IT IS FURTHER ORDERED that, pursuant to Section 204(a), of the Communications Act of 1934, 47 U.S.C. § 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the tariff revisions filed by the National Exchange Carrier Association, Inc., Transmittal No. 612, as specified in Section IV.C, *supra*, ARE SUSPENDED for one day, and are subject to the investigation in Universal Service Fund and Lifeline Assistance rates instituted in CC Docket No. 93-123. The National Exchange Carrier Association SHALL FILE a supplement reflecting this suspension no later than June 29, 1994, to be effective July 1, 1994.

117. IT IS FURTHER ORDERED that, pursuant to Sections 4(i) and 204(a) of the Communications Act of 1934, 47 U.S.C. §§ 154(i), 204(a), and Section 0.291 of the Commission's Rules, 47 C.F.R. § 0.291, the National Exchange Carrier Association, Inc., as specified in Section IV.C, *supra*, SHALL KEEP ACCURATE ACCOUNT of all amounts received that are associated with the tariff filings that are subject to the investigation in CC Docket No. 93-123.

118. IT IS FURTHER ORDERED that, the National Exchange Carrier Association, Inc., SHALL REVISE individual local exchange carrier obligations for long-term support payments in accordance with this Order. These revisions shall be filed on June 29, 1994, with a scheduled effective date of July 1, 1994.

119. IT IS FURTHER ORDERED that, all local exchange carriers ARE DIRECTED to revise their PCIs to reflect the 75 day estimate of the GNP-PI in their price cap adjustment filings. These revisions shall be filed no later than June 29, 1994.

120. IT IS FURTHER ORDERED that, any local exchange carrier required to make revisions reflecting GNP-PI and changes in long-term support obligations shall file these revisions no later than July 7, 1994, with a scheduled effective date of July 8, 1994.

121. IT IS FURTHER ORDERED that any local exchange carrier that is required to file a supplement reflecting a one day suspension pursuant to this Order, MAY FILE, no later than June 29, 1994, a supplement advancing the currently scheduled effective date to June 30, 1994, and at the same time file a supplement reflecting the one day suspension. For this purpose, we waive Sections 61.58 and 61.59 of the Commission's Rules, 47 C.F.R. §§ 61.58, 61.59. Carriers should cite the "DA" number of the instant Order as the authority for this filing.

122. IT IS FURTHER ORDERED that the petitions to suspend and investigate or to reject the Annual 1994 Access Tariff Filings ARE GRANTED to the extent indicated herein and otherwise ARE DENIED.

FEDERAL COMMUNICATIONS COMMISSION

A. Richard Metzger, Jr.
Acting Chief
Common Carrier Bureau

Appendix A

Petitions

The following parties filed petitions against the 1994 Annual Access Tariff Filings. The names in parentheses are used for these parties throughout the Order.

Allnet Communications Services, Inc. (Allnet)
American Telephone and Telegraph Company (AT&T)
Competitive Telecommunications Association (Comptel)
MCI Telecommunications Corporation (MCI)
MFS Communications Company (MFS)
Sprint Communications Company, Limited Partnership (Sprint)
WilTel, Inc. (Wiltel)

Replies

The following parties filed replies to the petitions:

Ameritech Operating Companies (Ameritech)
Anchorage Telephone Utility (Anchorage)
Bell Atlantic Telephone Companies (Bell Atlantic)
BellSouth Telecommunications, Inc. (BellSouth)
Citizens Telecommunications Companies (Citizens)
GTE Telephone Operating Companies (GTOC)
NYNEX Telephone Companies (NYNEX)
Southern New England Telephone Company (SNET)
Southwestern Bell Telephone Company (Southwestern Bell)
US West Communications, Inc. (US West)

Appendix B

Company Codes for the 1994 Annual Access Tariff Filings

	COSA	Company	Study Areas
	Bell Operating Companies		
1	amtr	Ameritech	Composite
2	batr	Bell Atlantic	Composite
3	bstr	Bell South	Composite
4	nxtr	NYNEX	Composite
5	swtr	Southwestern Bell	Composite
6	ustr	U S West	Composite
	GTE		
7	gail	GTE Telephone	GTE IL + Alltel IL
8	gain	GTE Telephone	GTE IN + Alltel IN
9	gami	GTE Telephone	GTE MI + Alltel MI
10	gnca	GTE Telephone	W.C. California
11	gtak	GTE Telephone	Alaska
12	gtal	GTE Telephone	Alabama
13	gtar	GTE Telephone	Arkansas
14	gtca	GTE Telephone	California
15	gtfl	GTE Telephone	Florida
16	gthi	GTE Telephone	Hawaii
17	gtia	GTE Telephone	Iowa
18	gtid	GTE Telephone	Idaho
19	gtky	GTE Telephone	Kentucky
20	gtmc	GTE Telephone	Micronesia
21	gtmn	GTE Telephone	Minnesota
22	gtmo	GTE Telephone	Missouri
23	gtmt	GTE Telephone	Montana
24	gtnc	GTE Telephone	North Carolina
25	gtne	GTE Telephone	Nebraska
26	gtnm	GTE Telephone	New Mexico
27	gtoh	GTE Telephone	Ohio
28	gtok	GTE Telephone	Oklahoma
29	gtor	GTE Telephone	Oregon
30	gtpa	GTE Telephone	Pennsylvania
31	gtsc	GTE Telephone	South Carolina
32	gttx	GTE Telephone	Texas
33	gtva	GTE Telephone	Virginia
34	gtwa	GTE Telephone	Washington
35	gtwi	GTE Telephone	Wisconsin
36	coal	GTE Systen	Alabama
37	coar	GTE Systen	Arkansas
38	coaz	GTE Systen	Arizona East
39	coca	GTE Systen	California
40	coil	GTE Systen	Illinois
41	coin	GTE Systen	Indiana
42	coit	GTE Systen	Iowa
43	coky	GTE Systen	Kentucky
44	come	GTE Systen	Maine
45	comn	GTE Systen	Minnesota
46	comt	GTE Systen	Missouri
	GTE (Continued)		
47	conc	GTE Systen	North Carolina
48	conh	GTE Systen	New Hampshire
49	conm	GTE Systen	Mew Mexico
50	conv	GTE Systen	Nevada
51	coor	GTE Systen	Oregon
52	copt	GTE Systen	Pennsylvania
53	cosc	GTE Systen	South Carolina
54	cotx	GTE Systen	Texas
55	cova	GTE Systen	Virginia
56	covt	GTE Systen	Vermont
57	cowa	GTE Systen	Washington
58	cowz	GTE Systen	Arizona West
	United & Central		
59	cefl	Central	Florida
60	ceil	Central	Illinois
61	cenc	Central	North Carolina
62	cenv	Central	Nevada
63	cetx	Central	Texas
64	ceva	Central	Virginia
65	uteg	United	Eastern
66	utfl	United	Florida
67	utin	United	Indiana
68	utmw	United	Midwest
69	utnc	United	North Carolina
70	utnw	United	Northwest
71	utoh	United	Ohio
72	utse	United	Southeast
	Other		
73	ltne	Lincoln	Composite
74	snct	Southern N.E.	Composite

Bell Operating Companies

ANALYZER
Filing Date: 4/22/94
Filing Entity: AMTR
Transmittal Number: 791
1994 Annual Filing (Filename: AMTRAN94)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($53,623)			
ISW	$0			
RDA	$0			
EDT	$4,709			
ITC	$5,224			
REMOVAL SHARING/LOW END	$15,572			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($68,767)			
TELECOMM.RELAY SVCS.	$1,036			
OTHER	$0			
TOTAL OF INDIVIDUALS	($95,849)			
TOTAL EXOGENOUS	($95,849)			
COMMON LINE				
Term Prem CCL Rate	0.00650	0.00650	-0.00000	*
Orig Prem CCL Rate	0.00650	0.00650	-0.00000	*
g	0.01477			
Proposed PCI	67.8150	67.8150	-0.0000	*

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ANALYZER
Filing Date: 4/22/94
Filing Entity: AMTR
Transmittal Number: 791
1994 Annual Filing (Filename: AMTRAN94)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	90.3902	90.3902	0.000	*
SBI: Upper Limit	92.5660	92.5660	-0.000	*
SBI: Lower Limit	83.7502	83.7502	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	79.0275	79.0275	0.000	*
SBI: Upper Limit	80.9298	80.9298	-0.000	*
SBI: Lower Limit	73.2222	73.2222	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.4071	102.4071	-0.000	*
SBI: Lower Limit	92.6541	92.6541	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces				
Proposed SBI	93.9091	93.9091	0.000	*
SBI: Upper Limit	96.1696	96.1696	-0.000	*
SBI: Lower Limit	87.0106	87.0106	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.4071	102.4071	-0.000	*
SBI: Lower Limit	92.6541	92.6541	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	90.2725	90.2725	0.000	*
TS PCI	82.9702	82.9702	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	82.51	82.51	0.000	*
Interexchange PCI	91.47	91.47	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW

ANALYZER
Filing Date: 4/22/94
Filing Entity: AMTR
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	92.9693	92.9693	0.000	*
SBI: Upper Limit	97.5643	97.5643	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	99.5078	99.5078	0.000	*
SBI: Upper Limit	99.5156	99.5156	0.000	*
SBI: Lower Limit	92.6861	92.6861	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	97.00	97.00	0.000	*
SBI: Upper Limit	99.37	99.37	0.000	*
SBI: Lower Limit	89.91	89.91	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	90.84	90.84	0.000	*
SBI: Upper Limit	93.06	93.06	0.000	*
SBI: Lower Limit	84.20	84.20	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	79.41	79.41	0.000	*
Sub-Index Up Lim	81.35	81.35	0.000	*
Sub-Index Low Lim	73.60	73.60	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	75.47	75.47	0.000	*
Sub-Index Up Lim	77.31	77.31	0.000	*
Sub-Index Low Lim	69.95	69.95	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	80.60	80.60	0.000	*
SBI: Upper Limit	82.57	82.57	0.000	*
SBI: Lower Limit	74.71	74.71	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	84.86	84.86	0.000	*
Trunking PCI	88.72	88.72	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

ANALYZER
Filing Date: 4/22/94
Filing Entity: AMTR
Transmittal Number: 791
1994 Annual Filing (Filename: AMTRAN94)

TRUNKING	LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/22/94
Filing Entity: AMTR
Transmittal Number: 791
1994 Annual Filing (Filename: AMTRAN94)

TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	79.4079	79.4079	0.000	*
Sub-I	81.3474	81.3474	0.000	*
Sub-I	69.7284	69.7284	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	79.4079	79.4079	0.000	*
Sub-I	81.3474	81.3474	0.000	*
Sub-I	69.7284	69.7284	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	79.4079	79.4079	0.000	*
Sub-I	81.3474	81.3474	0.000	*
Sub-I	69.7284	69.7284	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/22/94
Filing Entity: AMTR
Transmittal Number: 791
1994 Annual Filing (Filename: AMTRAN94)

TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	74.8600	74.8600	0.000	*
Sub-I	76.6665	76.6665	0.000	*
Sub-I	65.7330	65.7330	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	75.9483	75.9483	0.000	*
Sub-I	77.8034	77.8034	0.000	*
Sub-I	66.6666	66.6666	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	73.2008	73.2008	0.000	*
Sub-I	74.9666	74.9666	0.000	*
Sub-I	64.2761	64.2761	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/1/94
Filing Entity: BATR
Transmittal Number: 644
1994 Annual Filing (Filename: BATRAN94.WK3)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02634			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thou				
SPF	$0			
DEM	$0			
LTS/TRB	($47,710)			
IBW	$0			
RDA	$0			
EDT	$385			
ITC	$493			
REMOVAL SHARING/LOW END	$2,005			
REVISION SHARING/LOW END	($772)			
SHARING/LOW END ADJ	($50,000)			
TELECOMM.RELAY SVCS.	$0			
OTHER	($44,997)			
TOTAL OF INDIVIDUALS	($150,284)			
TOTAL EXOGENOUS	($150,284)			
COMMON LINE				
Term Prem CCL Rate	0.00752	0.00752	-0.00000	*
Orig Prem CCL Rate	0.00752	0.00752	-0.00000	*
g	0.02750			
Proposed PCI	85.8715	85.8715	0.0000	*

ANALYZER
Filing Date: 4/1/94
Filing Entity: BATR
Transmittal Number: 644
1994 Annual Filing (Filename: BATRAN94.WK3)
Page 2 of 6

	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	94.2401	94.2401	-0.000	*
SBI: Upper Limit	96.2724	96.2723	0.000	*
SBI: Lower Limit	87.1036	87.1035	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	96.7460	96.7460	0.000	*
SBI: Upper Limit	98.6460	98.6459	0.000	*
SBI: Lower Limit	89.2511	89.2510	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	93.0776	93.0841	-0.006	*
SBI: Upper Limit	93.1548	93.1547	0.000	*
SBI: Lower Limit	84.2829	84.2828	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	93.1291	93.1291	0.000	*
SBI: Upper Limit	93.1548	93.1547	0.000	*
SBI: Lower Limit	84.2829	84.2828	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.0000	104.9998	0.000	*
SBI: Lower Limit	95.0000	94.9998	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	94.2429	94.2429	0.000	*
TS PCI	94.2548	94.2547	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	92.4509	92.4509	-0.000	*
Interexchange PCI	93.2193	93.2193	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
Filing Date: 4/1/94
Filing Entity: BATR
Transmittal Number: 644
1994 Annual Filing (Filename: BATRAN94.WK3)
Page 3 of 6

	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	94.6686	94.6688	0.000	*
SBI: Upper Limit	94.6826	94.6826	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	96.3241	96.3241	-0.000	*
SBI: Upper Limit	96.5763	96.5762	0.000	*
SBI: Lower Limit	89.9485	89.9484	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	95.1973	95.1973	0.000	*
SBI: Upper Limit	95.2005	95.2004	0.000	*
SBI: Lower Limit	86.1338	86.1337	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	96.5215	96.5215	0.000	*
SBI: Upper Limit	96.5220	96.5219	0.000	*
SBI: Lower Limit	89.1389	89.1389	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	79.5623	79.5623	0.000	*
Sub-Index Up Lim	81.3038	81.3038	0.000	*
Sub-Index Low Lim	73.5806	73.5805	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	74.9580	74.9580	-0.000	*
Sub-Index Up Lim	76.2946	76.2945	0.000	*
Sub-Index Low Lim	69.0264	69.0264	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	80.0884	80.0884	0.000	*
SBI: Upper Limit	82.3099	82.3099	0.000	*
SBI: Lower Limit	74.4709	74.4708	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	101.3011	101.3005	0.001	*
SBI: Upper Limit	101.5488	101.5488	0.000	*
SBI: Lower Limit	91.8775	91.8775	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	85.2210	85.2210	0.000	*
Trunking PCI	85.2222	85.2222	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
Filing Date: 4/1/94
Filing Entity: BATR
Transmittal Number: 644
1994 Annual Filing (Filename: BATRAN94.WK3)

	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	96.3681	96.3681	-0.000	*
Sub-I	99.4167	99.4167	0.000	*
Sub-I	85.2143	85.2143	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
TandemSwitchedTransport Density Zone 2				
Prop $	96.2391	96.2390	0.000	*
Sub-I	99.4167	99.4167	0.000	*
Sub-I	85.2143	85.2143	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
TandemSwitchedTransport Density Zone 3				
Prop $	96.2560	96.2560	-0.000	*
Sub-I	99.4167	99.4167	0.000	*
Sub-I	85.2143	85.2143	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 1				
Prop $	90.9727	90.9727	0.000	*
Sub-I	95.2005	95.2004	0.000	*
Sub-I	81.6004	81.6004	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 2				
Prop $	89.9913	89.9913	0.000	*
Sub-I	95.2005	95.2004	0.000	*
Sub-I	81.6004	81.6004	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 3				
Prop $	89.7275	89.7275	-0.000	*
Sub-I	95.2005	95.2004	0.000	*
Sub-I	81.6004	81.6004	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

ANALYZER
Filing Date: 4/1/94
Filing Entity: BATR
Transmittal Number: 644
1994 Annual Filing (Filename: BATRAN94.WK3)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 1				
Prop $	79.6541	79.6541	0.000	*
Sub-I	81.3036	81.3036	0.000	*
Sub-I	69.6890	69.6889	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 2				
Prop $	81.2863	81.2863	-0.000	*
Sub-I	81.3036	81.3036	0.000	*
Sub-I	69.6890	69.6889	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 3				
Prop $	77.3802	77.3802	0.000	*
Sub-I	81.3036	81.3036	0.000	*
Sub-I	69.6890	69.6889	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

ANALYZER
Filing Date: 4/1/94
Filing Entity: BATR
Transmittal Number: 644
1994 Annual Filing (Filename: BATRAN94.WK3)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 1				
Prop $	74.8542	74.8542	-0.000	*
Sub-I	76.2946	76.2945	0.000	*
Sub-I	65.3954	65.3953	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 2				
Prop $	76.2900	76.2901	-0.000	*
Sub-I	76.2946	76.2945	0.000	*
Sub-I	65.3954	65.3953	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 3				
Prop $	75.8022	75.8021	0.000	*
Sub-I	76.2946	76.2945	0.000	*
Sub-I	65.3954	65.3953	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

ANALYZER
Filing Date: 4/1/94
Filing Entity: BSTR
Transmittal Number: 197
1994 Annual Filing (Filename: BSTRAN94)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02834			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$4,955			
IBW	$0			
RDA	$0			
EDT	$4,191			
ITC	$6,160			
REMOVAL SHARING/LOW END	$3,025			
REVISION SHARING/LOW END	$10,605			
SHARING/LOW END ADJ	($40,737)			
TELECOMM.RELAY SVCS.	$0			
OTHER	($4)			
TOTAL OF INDIVIDUALS	($11,805)			
TOTAL EXOGENOUS	($11,805)			
COMMON LINE				
Term Prem CCL Rate	0.01792	0.01792	-0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.01941			
Proposed PCI	101.8413	101.8413	0.0000	*

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ANALYZER
Filing Date: 4/1/94
Filing Entity: BSTR
Transmittal Number: 197
1994 Annual Filing (Filename: BSTRAN94)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	98.7535	98.7535	-0.000	*
SBI: Upper Limit	101.2361	101.2361	0.000	*
SBI: Lower Limit	91.5046	91.5046	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	93.0336	93.0336	0.000	*
SBI: Upper Limit	96.5328	96.5327	0.000	*
SBI: Lower Limit	87.3382	87.3381	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.7612	103.7611	0.000	*
SBI: Lower Limit	93.8792	93.8791	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	98.7906	98.7906	-0.000	*
SBI: Upper Limit	92.1302	92.1301	0.000	*
SBI: Lower Limit	83.3559	83.3558	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.7612	103.7611	0.000	*
SBI: Lower Limit	93.8792	93.8791	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	83.9065	83.9065	0.000	*
TS PCI	83.9061	83.9061	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	98.43	98.43	0.000	*
Interexchange PCI	97.11	97.11	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	98.6917	98.6917	-0.000	*
SBI: Upper Limit	98.9680	98.9705	-0.002	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.9482	100.9499	-0.002	*
SBI: Lower Limit	94.0204	94.0220	-0.002	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	96.58	96.58	0.000	*
SBI: Upper Limit	102.28	102.28	-0.002	*
SBI: Lower Limit	92.54	92.54	-0.002	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	96.97	96.97	-0.000	*
SBI: Upper Limit	100.77	100.77	-0.002	*
SBI: Lower Limit	91.17	91.17	-0.002	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	96.52	96.52	0.000	*
Sub-Index Up Lim	99.91	99.91	-0.002	*
Sub-Index Low Lim	91.35	91.35	-0.001	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	83.94	83.94	-0.000	*
Sub-Index Up Lim	87.54	87.54	-0.001	*
Sub-Index Low Lim	79.20	79.20	-0.001	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	83.56	83.56	0.000	*
SBI: Upper Limit	86.91	86.91	-0.001	*
SBI: Lower Limit	78.63	78.63	-0.001	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	88.78	88.78	-0.000	*
Trunking PCI	88.78	88.78	-0.002	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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Filing Entity: BSTR
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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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Filing Date: 4/1/94
Filing Entity: BSTR
Transmittal Number: 197
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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

ANALYZER
Filing Date: 4/1/94
Filing Entity: BSTR
Transmittal Number: 197
1994 Annual Filing (Filename: BSTRAN94)
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

ANALYZER
Filing Date: 6/09/94
Filing Entity: NXTR
Transmittal Number: 302
1994 Annual Filing
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$39,348			
ISW	$0			
RDA	$0			
EDT	$13,356			
ITC	$5,991			
REMOVAL SHARING/LOW END	$12,673			
REVISION SHARING/LOW END	($7,620)			
SHARING/LOW END ADJ	($9,480)			
TELECOMM.RELAY SVCS.	($1,503)			
OTHER	($10,594)			
TOTAL OF INDIVIDUALS	$42,170			
TOTAL EXOGENOUS	$42,170			
COMMON LINE				
Term Prem CCL Rate	0.00827	0.00864	−0.00037	LOW
Orig Prem CCL Rate	0.00827	0.00864	−0.00037	LOW
g	0.02229			
Proposed PCI	101.0186	101.0186	−0.0000	*

ANALYZER
Filing Date: 6/09/94
Filing Entity: NXTR
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1994 Annual Filing
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	98.3771	98.3771	0.000	*
SBI: Upper Limit	103.9828	103.9828	0.000	*
SBI: Lower Limit	94.0797	94.0797	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	91.6723	91.6723	0.000	*
SBI: Upper Limit	92.0690	92.0690	−0.000	*
SBI: Lower Limit	83.3006	83.3006	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.4313	104.4313	0.000	*
SBI: Lower Limit	94.4855	94.4855	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	95.2936	95.2936	0.000	*
SBI: Upper Limit	99.6058	99.6058	0.000	*
SBI: Lower Limit	90.1196	90.1196	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	NONE	100.000	HIGH
SBI: Upper Limit	104.4313	NONE	104.431	HIGH
SBI: Lower Limit	94.4855	NONE	94.485	HIGH
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	99.5319	99.5319	0.000	*
TS PCI	99.9176	99.9176	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	92.37	92.37	0.000	*
Interexchange PCI	92.39	92.39	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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Filing Date: 6/09/94
Filing Entity: NXTR
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1994 Annual Filing
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	99.6470	99.6470	−0.000	*
SBI: Upper Limit	99.6906	99.6906	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	93.8101	93.8101	0.000	*
SBI: Upper Limit	100.6676	100.6676	0.000	*
SBI: Lower Limit	93.7590	93.7590	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	102.70	102.70	−0.000	*
SBI: Upper Limit	107.57	107.57	−0.000	*
SBI: Lower Limit	97.33	97.33	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	109.13	109.13	−0.000	*
SBI: Upper Limit	109.18	109.18	−0.000	*
SBI: Lower Limit	98.78	98.78	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	77.29	77.29	0.000	*
Sub−Index Up Lim	85.40	85.40	0.000	*
Sub−Index Low Lim	77.27	77.27	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	78.65	78.65	−0.000	*
Sub−Index Up Lim	86.93	86.93	0.000	*
Sub−Index Low Lim	78.65	78.65	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	92.68	92.68	0.000	*
SBI: Upper Limit	90.26	90.26	−0.000	*
SBI: Lower Limit	81.67	81.67	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	91.58	91.58	−0.000	*
Trunking PCI	92.99	92.99	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	93.7992	93.7992	0.000	*
Sub-I	100.7557	100.7557	0.000	*
Sub-I	86.3920	86.3920	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	93.9498	93.9498	0.000	*
Sub-I	102.0495	102.0495	0.000	*
Sub-I	87.4719	87.4719	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	93.2987	93.2987	0.000	*
Sub-I	104.2129	104.2129	0.000	*
Sub-I	89.3254	89.3254	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	78.5636	78.5636	0.000	*
Sub-I	85.0256	85.0256	0.000	*
Sub-I	72.8791	72.8791	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	78.9654	78.9654	-0.000	*
Sub-I	86.1797	86.1797	0.000	*
Sub-I	73.8683	73.8683	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	74.4767	74.4767	-0.000	*
Sub-I	85.6874	85.6874	-0.000	*
Sub-I	73.4464	73.4464	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	78.8249	78.8249	-0.000	*
Sub-I	86.5797	86.5797	0.000	*
Sub-I	74.2111	74.2111	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	75.4841	75.4841	-0.000	*
Sub-I	86.0034	86.0034	0.000	*
Sub-I	73.7172	73.7172	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	78.2829	78.2829	0.000	*
Sub-I	86.1672	86.1672	0.000	*
Sub-I	75.5719	75.5719	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: SWTR
Transmittal Number: 2354
1994 Annual Filing (Filename: SWTRAN94)

	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: SWTR
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1994 Annual Filing (Filename: SWTRAN94)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	84.6437	84.6436	0.000	*
Sub-I	88.2373	88.2372	0.000	*
Sub-I	75.6320	75.6319	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	84.6090	84.6090	0.000	*
Sub-I	88.2373	88.2373	0.000	*
Sub-I	75.6320	75.6320	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	84.6090	84.6090	-0.000	*
Sub-I	88.2373	88.2373	0.000	*
Sub-I	75.6320	75.6320	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: SWTR
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	85.2068	85.2068	-0.000	*
Sub-I	90.1654	90.1654	0.000	*
Sub-I	77.2846	77.2846	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	85.0973	85.0973	-0.000	*
Sub-I	90.1654	90.1654	0.000	*
Sub-I	77.2846	77.2846	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	84.9352	84.9352	0.000	*
Sub-I	90.1654	90.1654	0.000	*
Sub-I	77.2846	77.2846	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$23,186			
ISW	$0			
RDA	$0			
EDT	$3,542			
ITC	$5,378			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($15,252)			
TELECOMM.RELAY SVCS.	($268)			
OTHER	$0			
TOTAL OF INDIVIDUALS	$16,586			
TOTAL EXOGENOUS	$16,536			
COMMON LINE				
Term Prem CCL Rate	0.01007	0.01006	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.01988			
Proposed PCI	98.6832	98.6832	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	95.1073	95.1073	−0.000	*
SBI: Upper Limit	100.0167	100.0167	−0.000	*
SBI: Lower Limit	90.4913	90.4913	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	95.8129	95.8129	−0.000	*
SBI: Upper Limit	99.6694	99.6694	−0.000	*
SBI: Lower Limit	90.1771	90.1771	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	0.0000	100.000	HIGH
SBI: Upper Limit	105.0000	0.0000	105.000	HIGH
SBI: Lower Limit	95.0000	0.0000	95.000	HIGH
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	95.9678	95.9678	0.000	*
SBI: Upper Limit	99.7616	99.7616	−0.000	*
SBI: Lower Limit	90.2905	90.2905	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	0.0000	100.000	HIGH
SBI: Upper Limit	105.0000	0.0000	105.000	HIGH
SBI: Lower Limit	95.0000	0.0000	95.000	HIGH
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	95.8448	95.8448	−0.000	*
TS PCI	95.8484	95.8484	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	100.4527	100.4527	0.000	*
Interexchange PCI	100.4678	100.4678	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	98.4037	98.4037	−0.000	*
SBI: Upper Limit	98.4057	98.4057	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	99.9092	99.9092	0.000	*
SBI: Upper Limit	101.0256	101.0256	0.000	*
SBI: Lower Limit	94.0925	94.0925	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	101.2246	101.2246	−0.000	*
SBI: Upper Limit	105.3691	105.3691	0.000	*
SBI: Lower Limit	95.3339	95.3339	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	102.7286	102.7286	0.000	*
SBI: Upper Limit	108.9317	108.9317	0.000	*
SBI: Lower Limit	96.7477	96.7477	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	82.0002	82.0003	−0.000	*
Sub-Index Up Lim	88.2372	88.2373	−0.000	*
Sub-Index Low Lim	79.8336	79.8337	−0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	84.6425	84.6424	0.000	*
Sub-Index Up Lim	90.1654	90.1654	0.000	*
Sub-Index Low Lim	81.5782	81.5782	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	83.3353	83.3353	−0.000	*
SBI: Upper Limit	89.4072	89.4072	0.000	*
SBI: Lower Limit	80.8922	80.8922	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	99.0140	99.0140	0.000	*
Trunking PCI	99.1698	99.1698	−0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$33,453			
ISW	$0			
RDA	$0			
EDT	$2,799			
ITC	$674			
REMOVAL SHARING/LOW END	$5,865			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($12,231)			
TELECOMM.RELAY SVCS.	$1,050			
OTHER	($18,454)			
TOTAL OF INDIVIDUALS	$13,445			
TOTAL EXOGENOUS	$13,445			
COMMON LINE				
Term Prem CCL Rate	0.00660	0.00683	-0.00023	LOW
Orig Prem CCL Rate	0.00660	0.00683	-0.00023	LOW
S	0.04836			
Proposed PCI	98.8666	98.8666	-0.0000	*

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Filing Entity: USTR
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	98.0395	98.0395	-0.000	*
SBI: Upper Limit	91.7197	91.7197	0.000	*
SBI: Lower Limit	82.9845	82.9845	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	77.9314	77.9314	-0.000	*
SBI: Upper Limit	78.8382	78.8382	0.000	*
SBI: Lower Limit	71.2307	71.2307	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.4178	102.4178	-0.000	*
SBI: Lower Limit	92.0637	92.0637	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	94.6298	94.6298	0.000	*
SBI: Upper Limit	96.9165	96.9165	-0.000	*
SBI: Lower Limit	87.6964	87.6964	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	92.3281	92.3281	-0.000	*
TS PCI	94.1251	94.1251	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	91.32	91.32	-0.000	*
Interexchange PCI	91.75	91.75	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	93.1435	93.1435	0.000	*
SBI: Upper Limit	97.4921	97.4922	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	99.4375	99.4375	-0.000	*
SBI: Upper Limit	99.4420	99.4420	-0.000	*
SBI: Lower Limit	92.6175	92.6176	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	98.8445	98.8445	0.000	*
SBI: Upper Limit	99.5313	99.5313	-0.000	*
SBI: Lower Limit	91.0045	91.0045	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	99.9367	99.9367	-0.000	*
SBI: Upper Limit	91.5470	91.5470	-0.000	*
SBI: Lower Limit	73.7906	73.7906	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	92.9268	92.9268	0.000	*
Sub-Index Up Lim	93.8549	93.8550	-0.000	*
Sub-Index Low Lim	75.8666	75.8666	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	97.6313	97.6313	-0.000	*
Sub-Index Up Lim	99.0830	99.0831	-0.000	*
Sub-Index Low Lim	91.9087	91.9087	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	97.7834	97.7834	0.000	*
SBI: Upper Limit	98.5822	98.5823	-0.000	*
SBI: Lower Limit	90.1458	90.1459	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Tanking				
Tanking API	93.0160	93.0160	0.000	*
Tanking PCI	98.1419	98.1419	-0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC		FCC	Delta	Flag
TRUNKING					
Tandem-Switched Transport Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
Tandem-Switched Transport Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
Tandem-Switched Transport Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
VG DTT/EF Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
VG DTT/EF Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
VG DTT/EF Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					

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TRUNKING					
DS1 Special Access Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 Special Access Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 Special Access Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 DTT/EF Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 DTT/EF Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 DTT/EF Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 Combined Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 Combined Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS1 Combined Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					

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TRUNKING					
DS3 Special Access Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 Special Access Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 Special Access Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 DTT/EF Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 DTT/EF Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 DTT/EF Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 Combined Density Zone 1					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 Combined Density Zone 2					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					
DS3 Combined Density Zone 3					
Prop $	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
Sub-I	0.0000		NONE	0.000	*
LEC Sub-Ind Out?					*
FCC Sub-Ind Out?					

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$384			
ISW	$0			
RDA	$0			
EDT	$62			
ITC	$30			
REMOVAL SHARING/LOW END	$824			
REVISION SHARING/LOW END	($494)			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$43			
OTHER	$0			
TOTAL OF INDIVIDUALS	$428			
TOTAL EXOGENOUS	$826			
COMMON LINE				
Term Prem CCL Rate	0.01962	0.03037	-0.01075	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.07870			
Proposed PCI	104.2340	104.2340	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.3653	92.3653	0.000	*
SBI: Upper Limit	96.9911	96.9911	0.000	*
SBI: Lower Limit	87.7538	87.7538	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.5248	92.5248	0.000	*
SBI: Upper Limit	96.9070	96.9070	0.000	*
SBI: Lower Limit	87.6777	87.6777	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.7382	104.7382	-0.000	*
SBI: Lower Limit	94.7613	94.7613	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	94.2900	94.2900	0.000	*
SBI: Upper Limit	98.7244	98.7244	0.000	*
SBI: Lower Limit	89.3220	89.3220	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.7382	104.7382	-0.000	*
SBI: Lower Limit	94.7613	94.7613	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	85.8844	85.8844	-0.000	*
TS PCI	85.8846	85.8846	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	92.70	92.70	-0.000	*
Interexchange PCI	92.72	92.72	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	99.7565	99.7565	0.000	*
SBI: Upper Limit	99.7565	99.7565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.7516	101.7516	0.000	*
SBI: Lower Limit	94.7687	94.7687	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	88.79	88.79	0.000	*
SBI: Upper Limit	93.00	93.00	0.000	*
SBI: Lower Limit	84.14	84.14	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	94.67	94.67	0.000	*
SBI: Upper Limit	98.16	98.16	-0.000	*
SBI: Lower Limit	89.72	89.72	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	88.90	88.90	-0.000	*
Sub-Index Up Lim	93.60	93.60	0.000	*
Sub-Index Low Lim	84.89	84.89	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	84.65	84.65	-0.000	*
Sub-Index Up Lim	88.67	88.67	0.000	*
Sub-Index Low Lim	80.22	80.22	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	88.36	88.36	-0.000	*
SBI: Upper Limit	92.82	92.82	0.000	*
SBI: Lower Limit	83.98	83.98	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	88.70	88.70	0.000	*
Trunking PCI	88.70	88.70	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES In thous				
SPF	$0			
DEM	$335			
LTS/TRS	$0			
ISW	$0			
RDA	$109			
EDT	$175			
IFC	$3,306			
REMOVAL SHARING/LOW END	($452)			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$44			
TELECOMM.RELAY SVCS.	$0			
OTHER	$3,518			
TOTAL OF INDIVIDUALS	$3,518			
TOTAL EXOGENOUS				
COMMON LINE				
Term Prem CCL Rate	0.01832	0.03310	-0.01478	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.04456			
Proposed PCI	108.4908	108.4908	0.0000	*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GAIN
Transmittal Number: 875
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	81.9150	81.9150	0.000	*
SBI: Upper Limit	88.0422	88.0422	0.000	*
SBI: Lower Limit	79.6572	79.6572	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	84.5927	84.5927	0.000	*
SBI: Upper Limit	90.9202	90.9202	0.000	*
SBI: Lower Limit	82.2611	82.2611	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	107.4799	107.4799	-0.000	*
SBI: Lower Limit	97.2437	97.2437	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	88.7000	88.7000	0.000	*
SBI: Upper Limit	95.3347	95.3347	0.000	*
SBI: Lower Limit	86.2552	86.2552	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	107.4799	107.4799	-0.000	*
SBI: Lower Limit	97.2437	97.2437	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	74.3818	74.3818	0.000	*
TS PCI	76.5735	76.5735	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	92.70	92.70	-0.000	*
Interexchange PCI	92.72	92.72	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GAIN
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1994 Annual Filing (Filename: GAIN4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.4880	102.4880	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.5378	104.5378	0.000	*
SBI: Lower Limit	97.3636	97.3636	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	84.61	84.61	0.000	*
SBI: Upper Limit	91.05	91.05	0.000	*
SBI: Lower Limit	82.36	82.36	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	86.51	86.51	0.000	*
SBI: Upper Limit	93.10	93.10	0.000	*
SBI: Lower Limit	84.23	84.23	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	79.86	79.86	0.000	*
Sub-Index Up Lim	85.96	85.96	-0.000	*
Sub-Index Low Lim	77.77	77.77	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	79.34	79.34	0.000	*
Sub-Index Up Lim	85.36	85.36	0.000	*
Sub-Index Low Lim	77.25	77.25	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	77.73	77.73	0.000	*
SBI: Upper Limit	83.65	83.65	0.000	*
SBI: Lower Limit	75.68	75.68	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	80.70	80.70	-0.000	*
Trunking PCI	83.10	83.10	0.000	LO
LEC API Above PCI?				LO
FCC API Above PCI?				

ANALYZER
Filing Date: 4/29/94
Filing Entity: GAIN
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1994 Annual Filing (Filename: GAIN4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GAIN
Transmittal Number: 875
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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GAIN
Transmittal Number: 875
1994 Annual Filing (Filename: GAIN4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Date: 4/29/94
Filing Entity: GAMI
Transmittal Number: 675
1994 Annual Filing (Filename: GAMI4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$398			
ISW	$0			
RDA	$0			
EDT	$15			
ITC	$87			
REMOVAL SHARING/LOW END	$3,666			
REVISION SHARING/LOW END	$367			
SHARING/LOW END ADJ	$4,630			
TELECOMM.RELAY SVCS.	$42			
OTHER	$0			
TOTAL OF INDIVIDUALS	$9,214			
TOTAL EXOGENOUS	$9,214			
COMMON LINE				
Term Prem CCL Rate	0.02041	0.03954	-0.01913	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.09648			
Proposed PCI	115.2631	115.2631	0.0000	*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GAMI
Transmittal Number: 675
1994 Annual Filing (Filename: GAMI4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	91.0350	91.0350	-0.000	*
SBI: Upper Limit	100.6175	100.6175	-0.000	*
SBI: Lower Limit	91.0349	91.0349	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	90.7358	90.7358	0.000	*
SBI: Upper Limit	100.2847	100.2847	0.000	*
SBI: Lower Limit	90.7338	90.7338	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	103.2981	103.2981	-0.000	*
SBI: Upper Limit	114.1373	114.1373	-0.000	*
SBI: Lower Limit	103.2671	103.2671	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	92.2400	92.2400	-0.000	*
SBI: Upper Limit	101.9474	101.9474	-0.000	*
SBI: Lower Limit	92.2382	92.2382	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	104.0000	104.0000	0.000	*
SBI: Upper Limit	114.1373	114.1373	-0.000	*
SBI: Lower Limit	103.2671	103.2671	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	83.9651	83.9651	-0.000	*
TS PCI	98.4077	98.4077	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GAMI
Transmittal Number: 675
1994 Annual Filing (Filename: GAMI4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.9529	108.9529	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	108.5063	108.5063	-0.000	*
SBI: Upper Limit	111.1320	111.1320	0.000	*
SBI: Lower Limit	108.5058	108.5058	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	99.22	99.22	0.000	*
SBI: Upper Limit	108.63	108.63	0.000	*
SBI: Lower Limit	99.19	99.19	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	99.50	99.50	0.000	*
SBI: Upper Limit	105.34	105.34	0.000	*
SBI: Lower Limit	95.31	95.31	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	79.80	79.80	-0.000	*
Sub-Index Up Lim	88.18	88.18	-0.000	*
Sub-Index Low Lim	79.78	79.78	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	104.49	104.49	0.000	*
Sub-Index Up Lim	114.49	114.49	0.000	*
Sub-Index Low Lim	103.51	103.51	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	79.72	79.72	0.000	*
SBI: Upper Limit	88.08	88.08	-0.000	*
SBI: Lower Limit	79.69	79.69	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	85.29	85.29	0.000	*
Trunking PCI	91.14	91.14	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GAMI
Transmittal Number: 876
1994 Annual Filing (Filename: GAM4294)

	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GAMI
Transmittal Number: 876
1994 Annual Filing (Filename: GAM4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GAMI
Transmittal Number: 876
1994 Annual Filing (Filename: GAM4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI				
X for CL, TS and SP	0.02636			
X for IX	0.03300			
	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$4			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$0			
REMOVAL SHARING/LOW END	$11			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$144			
OTHER	$1			
TOTAL OF INDIVIDUALS	$0			
TOTAL EXOGENOUS	$159			
	$159			
COMMON LINE				
Term Prem CCL Rate	0.02108	0.05235	-0.03129	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	-0.18294			
Proposed PCI	134.3417	134.3417	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	87.7169	87.7169	0.000	*
SBI: Upper Limit	96.9496	96.9496	0.000	*
SBI: Lower Limit	87.7163	87.7163	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	90.9377	90.9377	-0.000	*
SBI: Upper Limit	100.4969	100.4969	0.000	*
SBI: Lower Limit	90.9256	90.9256	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	78.2918	78.2918	0.000	*
TS PCI	86.4266	86.4266	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.6234	108.6234	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	101.2951	101.2951	0.000	*
SBI: Upper Limit	108.7589	108.7589	0.000	*
SBI: Lower Limit	101.2922	101.2922	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	63.37	63.37	0.000	*
SBI: Upper Limit	70.04	70.04	0.000	*
SBI: Lower Limit	63.37	63.37	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	63.22	63.22	0.000	*
Sub-Index Up Lim	66.87	66.87	0.000	*
Sub-Index Low Lim	63.22	63.22	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	60.44	60.44	0.000	*
SBI: Upper Limit	66.80	66.80	0.000	*
SBI: Lower Limit	60.44	60.44	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	62.37	62.37	-0.000	*
Trunking PCI	77.40	77.40	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$4			
IBW	$0			
RDA	$0			
EDT	$4			
ITC	$7			
REMOVAL SHARING/LOW END	$166			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($147)			
TELECOMM.RELAY SVCS.	$1			
OTHER	$0			
TOTAL OF INDIVIDUALS	($25)			
TOTAL EXOGENOUS	($25)			
COMMON LINE				
Term Prem CCL Rate	0.02181	0.03121	-0.00939	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02491			
Proposed PCI	105.9180	105.9180	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	89.2003	89.2003	-0.000	*
SBI: Upper Limit	93.3803	93.3803	0.000	*
SBI: Lower Limit	84.4868	84.4868	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	94.3606	94.3606	0.000	*
SBI: Upper Limit	97.4162	97.4162	-0.000	*
SBI: Lower Limit	88.1385	88.1385	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	68.1081	68.1081	0.000	*
SBI: Upper Limit	81.4743	81.4743	-0.000	*
SBI: Lower Limit	73.7148	73.7148	0.000	*
LEC SBI Out Bounds?				LOW
FCC SBI Out Bounds?				LOW
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	109.2380	109.2380	-0.000	*
SBI: Lower Limit	93.4058	93.4058	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	91.0893	91.0893	0.000	*
TS PCI	91.0893	91.0893	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	87.26	87.26	0.003	*
SBI: Upper Limit	90.70	90.70	0.000	*
SBI: Lower Limit	82.06	82.06	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	88.03	88.03	0.000	*
SBI: Upper Limit	91.51	91.51	0.000	*
SBI: Lower Limit	82.79	82.79	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	87.57	87.57	0.000	*
Sub-Index Up Lim	96.00	96.00	0.000	*
Sub-Index Low Lim	86.86	86.86	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	85.56	85.56	0.000	*
SBI: Upper Limit	91.86	91.86	0.000	*
SBI: Lower Limit	83.11	83.11	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	86.09	86.08	0.002	*
Trunking PCI	86.10	86.10	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($0)			
ISW	$0			
RDA	$0			
EDT	$13			
ITC	$68			
REMOVAL SHARING/LOW END	$338			
REVISION SHARING/LOW END	$71			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$14			
OTHER	$0			
TOTAL OF INDIVIDUALS	$505			
TOTAL EXOGENOUS	$505			
COMMON LINE				
Term Prem CCL Rate	0.02181	0.03118	-0.00937	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.10779			
Proposed PCI	104.2082	104.2082	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.6223	92.6223	0.000	*
SBI: Upper Limit	98.2326	98.2326	0.000	*
SBI: Lower Limit	88.8771	88.8771	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.4609	92.4609	0.000	*
SBI: Upper Limit	98.0614	98.0614	-0.000	*
SBI: Lower Limit	88.7222	88.7222	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0572	106.0572	0.000	*
SBI: Lower Limit	95.9565	95.9565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces				
Proposed SBI	93.5800	93.5800	0.000	*
SBI: Upper Limit	99.2483	99.2483	-0.000	*
SBI: Lower Limit	89.7961	89.7961	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0572	106.0572	0.000	*
SBI: Lower Limit	95.9565	95.9565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	92.1895	92.1895	0.000	*
TS PCI	83.0229	83.0229	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.2220	101.2220	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.2465	103.2465	0.000	*
SBI: Lower Limit	96.1609	96.1609	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.32	72.32	0.000	*
SBI: Upper Limit	76.87	76.87	0.000	*
SBI: Lower Limit	69.55	69.55	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	100.03	100.03	0.000	*
SBI: Upper Limit	100.04	100.04	-0.000	*
SBI: Lower Limit	90.52	90.52	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	89.80	89.80	0.000	*
Sub-Index Up Lim	74.18	74.18	-0.000	*
Sub-Index Low Lim	67.12	67.12	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	82.00	82.00	-0.000	*
Sub-Index Up Lim	87.15	87.15	0.000	*
Sub-Index Low Lim	78.85	78.85	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	88.87	88.87	0.000	*
SBI: Upper Limit	73.20	73.20	0.000	*
SBI: Lower Limit	66.23	66.23	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	70.52	70.52	-0.000	*
Trunking PCI	76.48	76.48	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem-Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem-Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem-Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: GTAK
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($9)			
ISW	$0			
RDA	$0			
EDT	$13			
ITC	$88			
REMOVAL SHARING/LOW END	$356			
REVISION SHARING/LOW END	$71			
SHARING/LOW END ADJ	$0			
TELECOMM./RELAY SVCS.	$14			
OTHER	$0			
TOTAL OF INDIVIDUALS	$305			
TOTAL EXOGENOUS	$305			
COMMON LINE				
Term Prem CCL Rate	0.02161	0.03118	-0.00957	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
B	0.10779			
Proposed PCI	104.2082	104.2082	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.6223	92.6223	0.000	*
SBI: Upper Limit	98.2326	98.2326	0.000	*
SBI: Lower Limit	88.8771	88.8771	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.4609	92.4609	0.000	*
SBI: Upper Limit	98.0614	98.0614	-0.000	*
SBI: Lower Limit	88.7222	88.7222	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0572	106.0572	0.000	*
SBI: Lower Limit	95.9565	95.9565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	93.5800	93.5800	0.000	*
SBI: Upper Limit	99.2483	99.2483	-0.000	*
SBI: Lower Limit	88.7961	88.7961	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0572	106.0572	0.000	*
SBI: Lower Limit	95.9565	95.9565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	82.1895	82.1895	0.000	*
TS PCI	83.0229	83.0229	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.2220	101.2220	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.2485	103.2485	0.000	*
SBI: Lower Limit	96.1609	96.1609	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.32	72.32	0.000	*
SBI: Upper Limit	76.87	76.87	0.000	*
SBI: Lower Limit	68.55	68.55	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	100.03	100.03	0.000	*
SBI: Upper Limit	100.04	100.04	-0.000	*
SBI: Lower Limit	90.52	90.52	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	89.80	89.80	0.000	*
Sub-Index Up Lim	74.18	74.18	-0.000	*
Sub-Index Low Lim	67.12	67.12	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	82.00	82.00	-0.000	*
Sub-Index Up Lim	87.15	87.15	0.000	*
Sub-Index Low Lim	78.85	78.85	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DS0				
Proposed SBI	68.87	68.87	0.000	*
SBI: Upper Limit	73.20	73.20	0.000	*
SBI: Lower Limit	66.23	66.23	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	70.52	70.52	-0.000	*
Trunking PCI	76.48	76.48	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: GTAL
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$22			
ISW	$0			
RDA	$0			
EDT	$2			
ITC	$0			
REMOVAL SHARING/LOW END	$131			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$951			
TELECOMM.RELAY SVCS.	$7			
OTHER	$0			
TOTAL OF INDIVIDUALS	$1,144			
TOTAL EXOGENOUS	$1,144			
COMMON LINE				
Term Prem CCL Rate	0.02173	0.04318	-0.02145	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02655			
Proposed PCI	122.7660	122.7660	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	77.9983	77.9983	-0.000	*
SBI: Upper Limit	86.2086	86.2086	0.000	*
SBI: Lower Limit	77.9991	77.9991	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	78.0363	78.0363	-0.000	*
SBI: Upper Limit	86.2408	86.2408	-0.000	*
SBI: Lower Limit	78.0274	78.0274	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.3219	100.3219	-0.000	*
SBI: Upper Limit	110.8738	110.8738	0.000	*
SBI: Lower Limit	100.3144	100.3144	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	87.2600	87.2600	0.000	*
SBI: Upper Limit	96.4360	96.4360	0.000	*
SBI: Lower Limit	87.2534	87.2534	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.0645	102.0645	-0.000	*
SBI: Upper Limit	110.8738	110.8738	0.000	*
SBI: Lower Limit	100.3144	100.3144	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	66.0071	66.0071	-0.000	*
TS PCI	80.2957	80.2957	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.0927	101.0927	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.1146	103.1146	0.000	*
SBI: Lower Limit	96.0381	96.0381	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	71.54	71.54	0.000	*
SBI: Upper Limit	75.93	75.93	-0.000	*
SBI: Lower Limit	66.70	66.70	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	66.78	66.78	0.000	*
Sub-Index Up Lim	73.00	73.00	0.000	*
Sub-Index Low Lim	66.05	66.05	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	65.12	65.12	0.000	*
SBI: Upper Limit	69.13	69.13	-0.000	*
SBI: Lower Limit	62.54	62.54	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	66.91	66.91	-0.000	*
Trunking PCI	81.81	81.81	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$428			
ISW	$0			
RDA	$0			
EDT	$507			
ITC	$1,229			
REMOVAL SHARING/LOW END	$1,528			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$50,775			
TELECOMM.RELAY SVCS.	$308			
OTHER	$0			
TOTAL OF INDIVIDUALS	$54,775			
TOTAL EXOGENOUS	$54,775			
COMMON LINE				
Term Prem CCL Rate	0.01573	0.04119	-0.02547	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.05167			
Proposed PCI	118.3104	118.3104	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	72.5262	72.5262	-0.000	*
SBI: Upper Limit	80.1626	80.1626	0.000	*
SBI: Lower Limit	72.5260	72.5260	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	83.8133	83.8133	0.000	*
SBI: Upper Limit	92.6323	92.6323	0.000	*
SBI: Lower Limit	83.8102	83.8102	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	108.1333	108.1330	0.000	*
SBI: Upper Limit	119.5140	119.5140	0.000	*
SBI: Lower Limit	108.1317	108.1317	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	82.4300	82.4300	0.000	*
SBI: Upper Limit	91.1055	91.1055	-0.000	*
SBI: Lower Limit	82.4288	82.4288	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	110.2339	110.2339	0.000	*
SBI: Upper Limit	119.5140	119.5140	0.000	*
SBI: Lower Limit	108.1317	108.1317	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	52.9562	52.9562	0.000	*
TS PCI	78.4186	78.4186	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	111.8185	111.8185	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	108.2388	108.2388	-0.000	*
SBI: Upper Limit	114.0549	114.0549	0.000	*
SBI: Lower Limit	108.2276	108.2276	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	66.20	66.20	0.000	*
SBI: Upper Limit	73.17	73.17	-0.000	*
SBI: Lower Limit	66.20	66.20	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	81.47	81.47	0.000	*
SBI: Upper Limit	90.04	90.04	0.000	*
SBI: Lower Limit	81.47	81.47	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	58.49	58.49	0.000	*
Sub-Index Up Lim	63.31	63.31	0.000	*
Sub-Index Low Lim	57.28	57.28	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	66.16	66.16	0.000	*
Sub-Index Up Lim	80.05	80.05	-0.000	*
Sub-Index Low Lim	72.43	72.43	0.000	LO
LEC Sub-Ind Out?				LO
FCC Sub-Ind Out?				
Total HiCap/DDS				
Proposed SBI	54.80	54.80	0.000	*
SBI: Upper Limit	60.55	60.55	-0.000	*
SBI: Lower Limit	54.78	54.78	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	60.22	60.22	0.000	*
Trunking PCI	82.67	82.67	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem-Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem-Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem-Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$329			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$1			
REMOVAL SHARING/LOW END	$396			
REVISION SHARING/LOW END	$273			
SHARING/LOW END ADJ	$4,491			
TELECOMM.RELAY SVCS.	$30,375			
OTHER	$152			
TOTAL OF INDIVIDUALS	$0			
TOTAL EXOGENOUS	$33,866			
COMMON LINE				
Term Prem CCL Rate	0.01608	0.03984	−0.02376	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02767			
Proposed PCI	119.2497	119.2497	−0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	78.6309	78.6309	0.000	*
SBI: Upper Limit	86.9071	86.9071	−0.000	*
SBI: Lower Limit	78.6303	78.6303	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	66.0170	66.0170	0.000	*
SBI: Upper Limit	72.9623	72.9623	−0.000	*
SBI: Lower Limit	66.0136	66.0136	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	108.8163	108.8163	−0.000	*
SBI: Upper Limit	116.0509	116.0509	−0.000	*
SBI: Lower Limit	108.8072	108.8072	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	86.5400	86.5400	−0.000	*
SBI: Upper Limit	97.8517	97.8517	0.000	*
SBI: Lower Limit	86.5325	86.5325	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	108.0000	108.0000	0.000	*
SBI: Upper Limit	118.0500	118.0500	−0.000	*
SBI: Lower Limit	108.8072	108.8072	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	89.3344	89.3344	−0.000	*
TS PCI	77.6058	77.6058	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	113.8031	113.8031	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	108.1244	108.1244	0.000	*
SBI: Upper Limit	116.0792	116.0792	0.000	*
SBI: Lower Limit	108.1129	108.1129	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	76.78	76.78	−0.000	*
SBI: Upper Limit	84.85	84.85	−0.000	*
SBI: Lower Limit	76.77	76.77	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	94.87	94.87	0.000	*
SBI: Upper Limit	104.86	104.86	−0.000	*
SBI: Lower Limit	94.87	94.87	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	60.4269	60.4269	−0.0000	*
Sub−Index Up Lim	65.0660	65.0660	−0.0000	*
Sub−Index Low Lim	58.8873	58.8873	−0.0000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	57.64	57.64	0.000	*
Sub−Index Up Lim	66.66	66.66	−0.000	*
Sub−Index Low Lim	62.32	62.32	−0.000	*
LEC Sub−Ind Out?				LO
FCC Sub−Ind Out?				LO
Total HiCap/DDS				
Proposed SBI	56.51	56.51	−0.000	*
SBI: Upper Limit	62.45	62.45	−0.000	*
SBI: Lower Limit	56.50	56.50	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	62.85	62.85	−0.000	*
Trunking PCI	56.84	56.84	−0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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TRUNKING	LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02936			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thou				
SPF	$0			
DEM	$0			
LTS/TRS	$37			
ISW	$0			
RDA	$0			
EDT	$76			
ITC	$51			
REMOVAL SHARING/LOW END	($4,142)			
REVISION SHARING/LOW END	$1,046			
SHARING/LOW END ADJ	$6,164			
TELECOMM.RELAY SVCS.	$66			
OTHER	$0			
TOTAL OF INDIVIDUALS	$3,297			
TOTAL EXOGENOUS	$3,297			
COMMON LINE				
Term Prem CCL Rate	0.01952	0.03279	-0.01328	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.03070			
Proposed PCI	108.2003	108.2003	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	87.1856	87.1856	0.000	*
SBI: Upper Limit	93.1796	93.1796	0.000	*
SBI: Lower Limit	84.3053	84.3053	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	87.2531	87.2531	0.000	*
SBI: Upper Limit	93.2517	93.2517	0.000	*
SBI: Lower Limit	84.3706	84.3706	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.8749	108.8749	-0.000	*
SBI: Lower Limit	99.0994	99.0994	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces				
Proposed SBI	95.8300	95.8300	0.000	*
SBI: Upper Limit	102.4183	102.4183	0.000	*
SBI: Lower Limit	92.9641	92.9641	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.8749	108.8749	-0.000	*
SBI: Lower Limit	99.0994	99.0994	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	84.0999	84.0999	0.000	*
TS PCI	99.9583	99.9583	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	88.19	88.19	0.000	*
Interexchange PCI	110.51	110.51	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.1022	102.1022	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.1443	104.1443	0.000	*
SBI: Lower Limit	99.9971	99.9971	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	78.47	78.47	-0.000	*
SBI: Upper Limit	84.12	84.12	-0.000	*
SBI: Lower Limit	76.11	76.11	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	92.63	92.63	0.000	*
SBI: Upper Limit	99.31	99.31	0.000	*
SBI: Lower Limit	89.85	89.85	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	91.90	91.90	0.000	*
Sub-Index Up Lim	96.36	96.36	0.000	*
Sub-Index Low Lim	90.04	90.04	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	81.28	81.28	0.000	*
Sub-Index Up Lim	87.14	87.14	0.000	*
Sub-Index Low Lim	78.84	78.84	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	96.04	96.04	0.000	*
SBI: Upper Limit	70.80	70.80	-0.000	*
SBI: Lower Limit	64.05	64.05	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	75.28	75.28	-0.000	*
Trunking PCI	85.79	85.79	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$67			
ISW	$0			
RDA	$0			
EDT	$15			
ITC	$34			
REMOVAL SHARING/LOW END	$1,230			
REVISION SHARING/LOW END	$591			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$0			
OTHER	$0			
TOTAL OF INDIVIDUALS	$1,925			
TOTAL EXOGENOUS	$1,925			
COMMON LINE				
Term Prem CCL Rate	0.01724	0.04156	−0.02432	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	•
g	−0.03054			
Proposed PCI	122.3662	122.3662	0.0000	•

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	90.0986	90.0986	0.000	•
SBI: Upper Limit	90.5803	90.5804	−0.000	•
SBI: Lower Limit	90.0985	90.0985	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	90.5554	90.5554	0.000	•
SBI: Upper Limit	100.0792	100.0792	0.000	•
SBI: Lower Limit	90.5478	90.5478	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	104.7686	104.7686	−0.000	•
SBI: Upper Limit	115.7856	115.7856	0.000	•
SBI: Lower Limit	104.7584	104.7584	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	91.8200	91.8200	−0.000	•
SBI: Upper Limit	101.4745	101.4745	0.000	•
SBI: Lower Limit	91.8102	91.8103	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	105.9540	105.9540	0.000	•
SBI: Upper Limit	115.7856	115.7856	0.000	•
SBI: Lower Limit	104.7584	104.7584	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	84.7140	84.7140	−0.000	•
TS PCI	88.1725	88.1725	−0.000	•
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	•
Interexchange PCI	0.00	NONE	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	105.9332	105.9332	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Tandem Switched Transport				
Proposed SBI	101.2344	101.2344	−0.000	•
SBI: Upper Limit	108.0519	108.0519	0.000	•
SBI: Lower Limit	100.6366	100.6366	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
VG, MT, TG				
Proposed SBI	76.72	76.72	−0.000	•
SBI: Upper Limit	84.30	84.30	0.000	•
SBI: Lower Limit	76.27	76.27	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Audio & Video				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
HiCap				
DS1				
Prop Sub−Index	70.46	70.46	0.000	•
Sub−Index Up Lim	77.42	77.42	0.000	•
Sub−Index Low Lim	70.05	70.05	−0.000	•
LEC Sub−Ind Out?				•
FCC Sub−Ind Out?				•
DS3				
Prop Sub−Index	0.00	NONE	0.000	•
Sub−Index Up Lim	0.00	NONE	0.000	•
Sub−Index Low Lim	0.00	NONE	0.000	•
LEC Sub−Ind Out?				•
FCC Sub−Ind Out?				•
Total HiCap/DDS				
Proposed SBI	69.05	69.05	0.000	•
SBI: Upper Limit	75.87	75.87	−0.000	•
SBI: Lower Limit	68.65	68.65	−0.000	•
LEC SBI Out?				•
FCC SBI Out?				•
Wideband				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Trunking				
Trunking API	73.96	73.96	−0.000	•
Trunking PCI	79.91	79.91	−0.000	•
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$39			
ISW	$0			
RDA	$0			
EDT	($4)			
ITC	$106			
REMOVAL SHARING/LOW END	$4,393			
REVISION SHARING/LOW END	($2)			
SHARING/LOW END ADJ	($1,612)			
TELECOMM.RELAY SVCS.	$15			
OTHER	$0			
TOTAL OF INDIVIDUALS	$2,955			
TOTAL EXOGENOUS	$2,955			
COMMON LINE				
Term Prem CCL Rate	0.01868	0.04146	-0.02278	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.05211			
Proposed PCI	122.8601	122.8601	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	78.0861	78.0861	-0.000	*
SBI: Upper Limit	86.3054	86.3054	0.000	*
SBI: Lower Limit	78.0858	78.0858	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	78.0177	78.0177	-0.000	*
SBI: Upper Limit	86.2180	86.2180	-0.000	*
SBI: Lower Limit	78.0068	78.0068	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	101.8616	101.8616	-0.000	*
SBI: Upper Limit	112.5770	112.5779	-0.000	*
SBI: Lower Limit	101.8562	101.8562	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	87.0000	87.0000	-0.000	*
SBI: Upper Limit	96.1528	96.1528	-0.000	*
SBI: Lower Limit	86.9954	86.9954	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.1053	102.1053	0.000	*
SBI: Upper Limit	112.5779	112.5779	-0.000	*
SBI: Lower Limit	101.8562	101.8562	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	74.4865	74.4865	0.000	*
TS PCI	78.9627	78.9627	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	87.04	87.04	0.000	*
Interexchange PCI	87.06	87.06	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.8652	108.8652	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	101.5259	101.5259	0.000	*
SBI: Upper Limit	109.0025	109.0025	0.000	*
SBI: Lower Limit	101.5220	101.5220	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	83.61	83.61	0.000	*
SBI: Upper Limit	92.63	92.63	0.000	*
SBI: Lower Limit	83.61	83.61	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	79.66	79.66	0.000	*
SBI: Upper Limit	88.00	88.00	-0.000	*
SBI: Lower Limit	79.62	79.62	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	58.75	58.75	0.000	*
Sub-Index Up Lim	64.92	64.92	0.000	*
Sub-Index Low Lim	58.74	58.74	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	74.83	74.83	0.000	*
Sub-Index Up Lim	82.69	82.69	0.000	*
Sub-Index Low Lim	74.81	74.81	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	62.30	62.30	0.000	*
SBI: Upper Limit	68.86	68.86	0.000	*
SBI: Lower Limit	62.30	62.30	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	74.21	74.21	-0.000	*
Trunking PCI	80.55	80.55	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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		LEC	FCC	Delta	Flag
TRUNKING					
Tandem-Switched Transport Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
Tandem-Switched Transport Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
Tandem-Switched Transport Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

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		LEC	FCC	Delta	Flag
TRUNKING					
DS1 Special Access Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTID
Transmittal Number: 875
1994 Annual Filing (Filename: GTID4294)

		LEC	FCC	Delta	Flag
TRUNKING					
DS3 Special Access Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTKY
Transmittal Number: 875
1994 Annual Filing (Filename: GTKY4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$109			
ISW	($9)			
RDA	$0			
EDT	$31			
ITC	$258			
REMOVAL SHARING/LOW END	$644			
REVISION SHARING/LOW END	$141			
SHARING/LOW END ADJ	$0			
TELECOMM./RELAY SVCS.	$33			
OTHER	$0			
TOTAL OF INDIVIDUALS	$1,206			
TOTAL EXOGENOUS	$1,206			
COMMON LINE				
Term Prem CCL Rate	0.01952	0.03180	-0.01228	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.06441			
Proposed PCI	108.0245	108.0245	-0.0000	*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTKY
Transmittal Number: 875
1994 Annual Filing (Filename: GTKY4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.6223	92.6223	0.000	*
SBI: Upper Limit	98.3541	98.3541	0.000	*
SBI: Lower Limit	88.9870	88.9870	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.4609	92.4609	0.000	*
SBI: Upper Limit	98.1827	98.1827	0.000	*
SBI: Lower Limit	88.8320	88.8320	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.1883	106.1883	-0.000	*
SBI: Lower Limit	93.8752	93.8752	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	93.5800	93.5800	0.000	*
SBI: Upper Limit	99.3711	99.3711	0.000	*
SBI: Lower Limit	88.9071	88.9071	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.1883	106.1883	-0.000	*
SBI: Lower Limit	93.8752	93.8752	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	82.1885	82.1885	0.000	*
TS PCI	83.1256	83.1256	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
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Filing Entity: GTKY
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.3606	101.3606	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.3880	103.3880	0.000	*
SBI: Lower Limit	96.2928	96.2928	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.32	72.32	0.000	*
SBI: Upper Limit	76.97	76.97	0.000	*
SBI: Lower Limit	68.64	68.64	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	91.36	91.36	-0.000	*
SBI: Upper Limit	94.18	94.18	0.000	*
SBI: Lower Limit	85.21	85.21	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	99.80	99.80	-0.000	*
Sub-Index Up Lim	74.28	74.28	0.000	*
Sub-Index Low Lim	67.21	67.21	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	74.84	74.84	-0.000	*
Sub-Index Up Lim	79.65	79.65	0.000	*
Sub-Index Low Lim	72.07	72.07	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/ODS				
Proposed SBI	67.74	67.74	0.000	*
SBI: Upper Limit	72.09	72.09	0.000	*
SBI: Lower Limit	65.23	65.23	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	88.77	88.77	0.000	*
Trunking PCI	77.33	77.33	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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Filing Entity: GTKY
Transmittal Number: 876
1994 Annual Filing (Filename: GTKY4294)

	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTKY
Transmittal Number: 876
1994 Annual Filing (Filename: GTKY4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTKY
Transmittal Number: 876
1994 Annual Filing (Filename: GTKY4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMC
Transmittal Number: 875
1994 Annual Filing (Filename: GTMC4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$23			
LTS/TRS	$0			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$0			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$12			
OTHER	$0			
TOTAL OF INDIVIDUALS	$35			
TOTAL EXOGENOUS	$35			
COMMON LINE				
Term Prem CCL Rate	0.08358	0.08836	-0.00479	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.00000			
Proposed PCI	102.1816	102.1816	0.0000	*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMC
Transmittal Number: 875
1994 Annual Filing (Filename: GTMC4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching	100.0000	100.0000	0.000	*
Proposed SBI	105.1078	105.1078	0.000	*
SBI: Upper Limit	95.0975	95.0975	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Information	100.0000	100.0000	0.000	*
Proposed SBI	105.1078	105.1078	0.000	*
SBI: Upper Limit	95.0975	95.0975	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Database Access	0.0000	NONE	0.000	*
Vert.Services: SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Database Access	0.0000	NONE	0.000	*
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Billing Name and Address	0.0000	NONE	0.000	*
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Traffic Sensitive	100.0000	100.0000	0.000	*
TS API	100.1028	100.1028	-0.000	*
TS PCI				*
LEC API Above PCI?				*
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	99.80	99.80	-0.000	*
Interexchange PCI	99.20	99.20	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW

ANALYZER
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Filing Entity: GTMC
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1994 Annual Filing (Filename: GTMC4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge	83.4962	83.4962	0.000	*
Proposed SBI	99.8485	99.8485	-0.000	*
SBI: Upper Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Tandem Switched Transport	100.0000	100.0000	0.000	*
Proposed SBI	101.8455	101.8455	-0.000	*
SBI: Upper Limit	94.8561	94.8561	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
VG, MT, TG	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Audio & Video	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
HiCap				
DS1	100.00	100.00	0.000	*
Prop Sub-Index	104.84	104.84	0.000	*
Sub-Index Up Lim	94.86	94.86	-0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3	0.00	NONE	0.000	*
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
Total HiCap/DDS	100.00	100.00	0.000	*
Proposed SBI	104.84	104.84	0.000	*
SBI: Upper Limit	94.86	94.86	-0.000	*
SBI: Lower Limit				*
LEC SBI Out?				*
FCC SBI Out?				
Wideband	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Trunking	94.85	94.85	0.000	*
Trunking API	99.85	99.85	0.000	*
Trunking PCI				LO
LEC API Above PCI?				LO
FCC API Above PCI?				

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Filing Date: 4/29/94
Filing Entity: GTMC
Transmittal Number: 875
1994 Annual Filing (Filename: GTMC4294)

	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMC
Transmittal Number: 875
1994 Annual Filing (Filename: GTMC4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMC
Transmittal Number: 875
1994 Annual Filing (Filename: GTMC4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: GTMN
Transmittal Number: 875
1994 Annual Filing (Filename: GTMN4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$2			
IXW	$0			
RDA	$0			
EDT	$1			
ITC	$3			
REMOVAL SHARING/LOW END	$35			
REVISION SHARING/LOW END	$14			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$0			
OTHER	$0			
TOTAL OF INDIVIDUALS	$55			
TOTAL EXOGENOUS	$55			
COMMON LINE				
Term Prem CCL Rate	0.01920	0.03714	-0.01794	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.07496			
Proposed PCI	114.5811	114.5811	0.0000	*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMN
Transmittal Number: 875
1994 Annual Filing (Filename: GTMN4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	90.6667	90.6667	0.000	*
SBI: Upper Limit	100.2468	100.2468	0.000	*
SBI: Lower Limit	90.6665	90.6665	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	91.1560	91.1560	0.000	*
SBI: Upper Limit	100.7489	100.7489	-0.000	*
SBI: Lower Limit	91.1538	91.1538	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	105.4665	105.4665	-0.000	*
SBI: Upper Limit	116.5605	116.5605	0.000	*
SBI: Lower Limit	105.4565	105.4565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	105.4665	105.4665	-0.000	*
SBI: Upper Limit	116.5605	116.5605	0.000	*
SBI: Lower Limit	105.4565	105.4565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	108.0000	108.0000	0.000	*
SBI: Upper Limit	116.5605	116.5605	0.000	*
SBI: Lower Limit	105.4565	105.4565	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	85.2610	85.2610	-0.000	*
TS PCI	89.7663	89.7663	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
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Filing Entity: GTMN
Transmittal Number: 875
1994 Annual Filing (Filename: GTMN4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	-0.000	*
SBI: Upper Limit	106.6667	106.6667	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	101.5542	101.5542	-0.000	*
SBI: Upper Limit	108.8020	108.8020	0.000	*
SBI: Lower Limit	101.3352	101.3352	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	76.96	76.96	0.000	*
SBI: Upper Limit	84.66	84.66	0.000	*
SBI: Lower Limit	76.80	76.80	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	73.96	73.96	-0.000	*
Trunking PCI	79.70	79.70	0.000	LO
LEC API Above PCI?				LO
FCC API Above PCI?				

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Filing Entity: GTMN
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1994 Annual Filing (Filename: GTMN4294)
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TRUNKING		LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

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Filing Date: 4/29/94
Filing Entity: GTMN
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TRUNKING		LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMN
Transmittal Number: 876
1994 Annual Filing (Filename: GTMN4294)
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TRUNKING		LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMO
Transmittal Number: 875
1994 Annual Filing (Filename: GTMO4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$21			
ISW	($34)			
RDA	($224)			
EDT	$39			
ITC	$14			
REMOVAL SHARING/LOW END	$606			
REVISION SHARING/LOW END	($30)			
SHARING/LOW END ADJ	$0			
TELECOMM./RELAY SVCS.	$10			
OTHER	$0			
TOTAL OF INDIVIDUALS	$393			
TOTAL EXOGENOUS	$393			
COMMON LINE				
Term Prem CCL Rate	0.01852	0.03183	-0.01232	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	
g	0.07192			
Proposed PCI	105.9192	105.9192	-0.0000	

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMO
Transmittal Number: 875
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	80.5043	80.5043	0.000	
SBI: Upper Limit	85.6716	85.6716	0.000	
SBI: Lower Limit	77.5124	77.5124	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Information				
Proposed SBI	80.4686	80.4686	0.000	
SBI: Upper Limit	85.6348	85.6348	-0.000	
SBI: Lower Limit	77.4791	77.4791	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	
SBI: Upper Limit	106.4186	106.4186	-0.000	
SBI: Lower Limit	96.2836	96.2836	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Database Access				
Proposed SBI	88.2200	88.2200	0.000	
SBI: Upper Limit	93.8825	93.8825	-0.000	
SBI: Lower Limit	84.9413	84.9413	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	
SBI: Upper Limit	106.4186	106.4186	-0.000	
SBI: Lower Limit	96.2836	96.2836	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Traffic Sensitive				
TS API	76.9481	76.9481	0.000	
TS PCI	77.9980	77.9980	0.000	
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	
Interexchange PCI	0.00	NONE	0.000	
LEC API Above PCI?				
FCC API Above PCI?				

ANALYZER
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	99.7538	99.7538	0.000	
SBI: Upper Limit	99.8489	99.8489	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	-0.000	
SBI: Upper Limit	101.8459	101.8459	0.000	
SBI: Lower Limit	94.8565	94.8565	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
VG, MT, TG				
Proposed SBI	77.84	77.84	0.000	
SBI: Upper Limit	81.60	81.60	0.000	
SBI: Lower Limit	73.83	73.83	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Audio & Video				
Proposed SBI	86.49	86.49	0.000	
SBI: Upper Limit	90.66	90.66	0.000	
SBI: Lower Limit	82.04	82.04	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
HiCap				
DS1				
Prop Sub-Index	71.39	71.39	0.000	
Sub-Index Up Lim	74.84	74.84	0.000	
Sub-Index Low Lim	67.72	67.72	0.000	
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3				
Prop Sub-Index	67.76	67.76	-0.000	
Sub-Index Up Lim	71.04	71.04	0.000	
Sub-Index Low Lim	64.27	64.27	0.000	
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
Total HiCap/DDS				
Proposed SBI	69.84	69.84	0.000	
SBI: Upper Limit	73.22	73.22	0.000	
SBI: Lower Limit	66.25	66.25	0.000	
LEC SBI Out?				
FCC SBI Out?				
Wideband				
Proposed SBI	0.00	NONE	0.000	
SBI: Upper Limit	0.00	NONE	0.000	
SBI: Lower Limit	0.00	NONE	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Trunking				
Trunking API	72.62	72.62	0.000	
Trunking PCI	76.60	76.60	0.000	
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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Filing Entity: GTMO
Transmittal Number: 876
1994 Annual Filing (Filename: GTMO4294)

	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMO
Transmittal Number: 876
1994 Annual Filing (Filename: GTMO4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMO
Transmittal Number: 876
1994 Annual Filing (Filename: GTMO4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMT
Transmittal Number: 675
1994 Annual Filing (Filename: GTMT4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02536			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$3			
ISW	$0			
RDA	$0			
EDT	$1			
ITC	$5			
REMOVAL SHARING/LOW END	$306			
REVISION SHARING/LOW END	($0)			
SHARING/LOW END ADJ	($141)			
TELECOMM.RELAY SVCS.	$1			
OTHER	$0			
TOTAL OF INDIVIDUALS	$295			
TOTAL EXOGENOUS	$295			
COMMON LINE				
Term Prem CCL Rate	0.02057	0.04716	−0.02660	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	−0.14756			
Proposed PCI	139.9634	139.9634	0.0000	*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMT
Transmittal Number: 675
1994 Annual Filing (Filename: GTMT4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	77.9533	77.9533	−0.000	*
SBI: Upper Limit	86.1586	86.1586	0.000	*
SBI: Lower Limit	77.9533	77.9533	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	77.8815	77.8815	−0.000	*
SBI: Upper Limit	86.0717	86.0717	0.000	*
SBI: Lower Limit	77.8744	77.8744	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.0000	102.0000	0.000	*
SBI: Upper Limit	112.3998	112.3998	−0.000	*
SBI: Lower Limit	101.6838	101.6838	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	74.3586	74.3586	0.000	*
TS PCI	78.8867	78.8867	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	57.84	57.84	0.000	*
Interexchange PCI	57.86	57.86	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMT
Transmittal Number: 675
1994 Annual Filing (Filename: GTMT4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	109.1232	109.1232	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	103.6809	103.6809	−0.000	*
SBI: Upper Limit	111.3056	111.3056	0.000	*
SBI: Lower Limit	103.6670	103.6670	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	85.56	85.56	−0.000	*
SBI: Upper Limit	94.56	94.56	0.000	*
SBI: Lower Limit	85.56	85.56	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	59.99	59.99	0.000	*
Sub−Index Up Lim	66.29	66.29	0.000	*
Sub−Index Low Lim	59.99	59.99	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	0.00	NONE	0.000	*
Sub−Index Up Lim	0.00	NONE	0.000	*
Sub−Index Low Lim	0.00	NONE	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	63.56	63.56	−0.000	*
SBI: Upper Limit	70.26	70.26	0.000	*
SBI: Lower Limit	63.56	63.56	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	74.87	74.87	0.000	*
Trunking PCI	82.16	82.16	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMT
Transmittal Number: 875
1994 Annual Filing (Filename: GTMT4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMT
Transmittal Number: 875
1994 Annual Filing (Filename: GTMT4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTMT
Transmittal Number: 875
1994 Annual Filing (Filename: GTMT4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTNC
Transmittal Number: 875
1994 Annual Filing (Filename: GTNC4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.85300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$30			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$28			
REMOVAL SHARING/LOW END	$313			
REVISION SHARING/LOW END	$47			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$20			
OTHER	$0			
TOTAL OF INDIVIDUALS	$453			
TOTAL EXOGENOUS	$453			
COMMON LINE				
Term Prem CCL Rate	0.01831	0.03204	-0.01372	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02454			
Proposed PCI	107.2986	107.2986	0.0000	*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTNC
Transmittal Number: 875
1994 Annual Filing (Filename: GTNC4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.6223	92.6223	0.000	*
SBI: Upper Limit	98.0784	98.0784	-0.000	*
SBI: Lower Limit	88.7376	88.7376	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.4608	92.4608	0.000	*
SBI: Upper Limit	97.9075	97.9075	-0.000	*
SBI: Lower Limit	88.5830	88.5830	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.8907	105.8907	-0.000	*
SBI: Lower Limit	95.8059	95.8059	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	93.5800	93.5800	0.000	*
SBI: Upper Limit	99.0926	99.0926	0.000	*
SBI: Lower Limit	89.6552	89.6552	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.8907	105.8907	-0.000	*
SBI: Lower Limit	95.8059	95.8059	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	82.1886	82.1886	0.000	*
TS PCI	82.8926	82.8926	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTNC
Transmittal Number: 875
1994 Annual Filing (Filename: GTNC4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.8408	100.8408	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.8576	102.8576	0.000	*
SBI: Lower Limit	95.7987	95.7987	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.32	72.32	0.000	*
SBI: Upper Limit	76.56	76.56	0.000	*
SBI: Lower Limit	69.26	69.26	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	90.70	90.70	-0.000	*
SBI: Upper Limit	93.70	93.70	0.000	*
SBI: Lower Limit	84.78	84.78	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	89.80	89.80	0.000	*
Sub-Index Up Lim	73.90	73.90	-0.000	*
Sub-Index Low Lim	86.86	86.86	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	80.48	80.48	-0.000	*
Sub-Index Up Lim	85.21	85.21	0.000	*
Sub-Index Low Lim	77.10	77.10	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	68.75	68.75	0.000	*
SBI: Upper Limit	72.79	72.79	0.000	*
SBI: Lower Limit	65.86	65.86	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	70.42	70.42	0.000	*
Trunking PCI	78.47	78.47	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTNC

ANALYZER
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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$38			
ISW	$0			
RDA	$0			
EDT	($2)			
ITC	$0			
REMOVAL SHARING/LOW END	$237			
REVISION SHARING/LOW END	$117			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$4			
OTHER	$0			
TOTAL OF INDIVIDUALS	$394			
TOTAL EXOGENOUS	$394			
COMMON LINE				
Term Prem CCL Rate	0.01851	0.03271	-0.01319	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.05149			
Proposed PCI	109.8544	109.8544	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	97.6046	97.6046	0.000	*
SBI: Upper Limit	107.5130	107.5130	0.000	*
SBI: Lower Limit	97.2737	97.2737	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	97.5630	97.5630	0.000	*
SBI: Upper Limit	107.4902	107.4902	0.000	*
SBI: Lower Limit	97.2530	97.2530	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	110.1516	110.1516	0.000	*
SBI: Lower Limit	99.8609	99.8609	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	110.1516	110.1516	0.000	*
SBI: Lower Limit	99.8609	99.8609	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	110.1516	110.1516	0.000	*
SBI: Lower Limit	99.8609	99.8609	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	98.8635	98.8635	0.000	*
TS PCI	101.8480	101.8480	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	-0.000	*
SBI: Upper Limit	101.2388	101.2388	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.2636	103.2636	0.000	*
SBI: Lower Limit	96.1769	96.1769	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	80.91	80.91	0.000	*
SBI: Upper Limit	86.01	86.01	0.000	*
SBI: Lower Limit	77.82	77.82	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	100.15	100.15	0.000	*
SBI: Upper Limit	100.15	100.15	0.000	*
SBI: Lower Limit	90.62	90.62	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	88.51	88.51	-0.000	*
Sub-Index Up Lim	94.09	94.09	0.000	*
Sub-Index Low Lim	85.13	85.13	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	88.03	88.03	-0.000	*
Sub-Index Up Lim	93.57	93.57	0.000	*
Sub-Index Low Lim	84.66	84.66	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	88.45	88.45	-0.000	*
SBI: Upper Limit	94.02	94.02	-0.000	*
SBI: Lower Limit	85.07	85.07	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	84.07	84.07	-0.000	*
Trunking PCI	86.42	86.42	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$25			
ISW	$0			
RDA	$0			
EDT	$22			
ITC	$0			
REMOVAL SHARING/LOW END	$65			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$404			
TELECOMM.RELAY SVCS.	$4			
OTHER	$0			
TOTAL OF INDIVIDUALS	$521			
TOTAL EXOGENOUS	$521			
COMMON LINE				
Term Prem CCL Rate	0.02131	0.03550	-0.01419	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.01836			
Proposed PCI	112.8551	112.8551	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	78.5748	78.5748	-0.000	*
SBI: Upper Limit	86.8455	86.8455	-0.000	*
SBI: Lower Limit	78.5745	78.5745	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	78.6037	78.6037	-0.000	*
SBI: Upper Limit	86.8770	86.8770	-0.000	*
SBI: Lower Limit	78.6030	78.6030	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	101.0577	101.0578	-0.000	*
SBI: Upper Limit	111.6917	111.6917	0.000	*
SBI: Lower Limit	101.0544	101.0544	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	87.9000	87.9000	-0.000	*
SBI: Upper Limit	97.1494	97.1494	-0.000	*
SBI: Lower Limit	87.8971	87.8971	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.4167	102.4167	0.000	*
SBI: Upper Limit	111.6917	111.6917	0.000	*
SBI: Lower Limit	101.0544	101.0544	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	66.4837	66.4837	-0.000	*
TS PCI	80.8881	80.8881	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.6444	106.6444	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	101.3127	101.3127	0.000	*
SBI: Upper Limit	108.7772	108.7772	0.000	*
SBI: Lower Limit	101.3121	101.3121	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.49	72.49	0.000	*
SBI: Upper Limit	80.10	80.10	0.000	*
SBI: Lower Limit	72.47	72.47	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	76.82	76.82	0.000	*
SBI: Upper Limit	84.89	84.89	0.000	*
SBI: Lower Limit	76.80	76.80	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	69.72	69.72	0.000	*
Sub-Index Up Lim	77.01	77.01	0.000	*
Sub-Index Low Lim	69.68	69.68	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	66.02	66.02	0.000	*
SBI: Upper Limit	72.92	72.92	-0.000	*
SBI: Lower Limit	65.96	65.96	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	69.47	69.47	0.000	*
Trunking PCI	85.93	85.93	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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Filing Entity: GTNM
Transmittal Number: 875
1994 Annual Filing (Filename: GTNM4294)

	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$339			
IBW	($24)			
RDA	$0			
EDT	$74			
ITC	$148			
REMOVAL SHARING/LOW END	$3,201			
REVISION SHARING/LOW END	$897			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$49			
OTHER	$0			
TOTAL OF INDIVIDUALS	$4,484			
TOTAL EXOGENOUS	$4,484			
COMMON LINE				
Term Prem CCL Rate	0.01951	0.03427	-0.01475	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.04013			
Proposed PCI	110.3038	110.3038	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	91.1176	91.1176	0.000	*
SBI: Upper Limit	99.2128	99.2128	-0.000	*
SBI: Lower Limit	89.7640	89.7640	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	91.0410	91.0410	0.000	*
SBI: Upper Limit	99.1294	99.1294	0.000	*
SBI: Lower Limit	89.6885	89.6885	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.8843	108.8843	-0.000	*
SBI: Lower Limit	98.5144	98.5144	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	92.3300	92.3300	-0.000	*
SBI: Upper Limit	100.5328	100.5328	-0.000	*
SBI: Lower Limit	90.9584	90.9584	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	108.8843	108.8843	-0.000	*
SBI: Lower Limit	98.5144	98.5144	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	83.7761	83.7761	0.000	*
TS PCI	86.8757	86.8757	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.7908	102.7908	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.8466	104.8466	0.000	*
SBI: Lower Limit	97.6513	97.6513	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	91.42	91.42	-0.000	*
SBI: Upper Limit	98.67	98.67	-0.000	*
SBI: Lower Limit	89.27	89.27	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	97.19	97.19	0.000	*
SBI: Upper Limit	97.22	97.22	-0.000	*
SBI: Lower Limit	87.96	87.96	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	80.03	80.03	0.000	*
Sub-Index Up Lim	86.36	86.36	-0.000	*
Sub-Index Low Lim	78.15	78.15	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	62.97	62.97	0.000	*
Sub-Index Up Lim	67.96	67.96	-0.000	*
Sub-Index Low Lim	61.49	61.49	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	76.04	76.04	0.000	*
SBI: Upper Limit	82.06	82.06	-0.000	*
SBI: Lower Limit	74.26	74.26	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	84.03	84.03	0.000	*
Trunking PCI	86.62	86.62	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$38			
ISW	$0			
RDA	$0			
EDT	$31			
ITC	$0			
REMOVAL SHARING/LOW END	$175			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$1,200			
TELECOMM.RELAY SVCS.	$0			
OTHER	$0			
TOTAL OF INDIVIDUALS	$1,452			
TOTAL EXOGENOUS	$1,452			
COMMON LINE				
Term Prem CCL Rate	0.02156	0.04012	-0.01856	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.01764			
Proposed PCI	118.9727	118.9727	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	78.2863	78.2863	-0.000	*
SBI: Upper Limit	86.5269	86.5269	-0.000	*
SBI: Lower Limit	78.2863	78.2863	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	78.3300	78.3300	0.000	*
SBI: Upper Limit	86.5583	86.5583	-0.000	*
SBI: Lower Limit	78.3147	78.3147	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.6898	100.6898	0.000	*
SBI: Upper Limit	111.2819	111.2819	-0.000	*
SBI: Lower Limit	100.6837	100.6837	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	87.5800	87.5800	0.000	*
SBI: Upper Limit	96.7930	96.7930	-0.000	*
SBI: Lower Limit	87.5746	87.5746	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.1272	102.1272	-0.000	*
SBI: Upper Limit	111.2819	111.2819	-0.000	*
SBI: Lower Limit	100.6837	100.6837	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	88.2501	88.2501	-0.000	*
TS PCI	80.5913	80.5913	-0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.8716	105.8716	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.5785	100.5785	-0.000	*
SBI: Upper Limit	107.9691	107.9691	0.000	*
SBI: Lower Limit	100.5780	100.5780	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	71.95	71.95	-0.000	*
SBI: Upper Limit	79.52	79.52	0.000	*
SBI: Lower Limit	71.95	71.95	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	76.25	76.25	0.000	*
SBI: Upper Limit	84.27	84.27	0.000	*
SBI: Lower Limit	76.25	76.25	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	88.18	88.18	0.000	*
Sub-Index Up Lim	76.45	76.45	0.000	*
Sub-Index Low Lim	88.17	88.17	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	100.58	100.58	0.000	*
Sub-Index Up Lim	111.17	111.17	0.000	*
Sub-Index Low Lim	100.58	100.58	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	65.51	65.51	-0.000	*
SBI: Upper Limit	72.39	72.39	0.000	*
SBI: Lower Limit	65.50	65.50	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	88.14	88.14	0.000	*
Trunking PCI	85.52	85.52	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOK
Transmittal Number: 876
1994 Annual Filing (Filename: GTOK4294)

	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOK
Transmittal Number: 876
1994 Annual Filing (Filename: GTOK4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOK
Transmittal Number: 876
1994 Annual Filing (Filename: GTOK4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOR
Transmittal Number: 675
1994 Annual Filing (Filename: GTOR4294)
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GENERAL	LEC	FCC	Delta	Flag
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$122			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	($22)			
REMOVAL SHARING/LOW END	$72			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$2,730			
OTHER	$39			
TOTAL OF INDIVIDUALS	$0			
TOTAL EXOGENOUS	$2,939	$2,939		
COMMON LINE				
Term Prem CCL Rate	0.01952	0.03332	-0.01380	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	•
g	0.03366			
Proposed PCI	108.5127	108.5127	0.0000	•

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOR
Transmittal Number: 675
1994 Annual Filing (Filename: GTOR4294)
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TRAFFIC SENSITIVE	LEC	FCC	Delta	Flag
Local Switching				
Proposed SBI	86.7216	86.7216	0.000	•
SBI: Upper Limit	95.4564	95.4564	0.000	•
SBI: Lower Limit	86.3953	86.3953	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	89.8947	89.8947	0.000	•
SBI: Upper Limit	98.9491	98.9491	0.000	•
SBI: Lower Limit	89.5253	89.5253	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	110.0722	110.0722	0.000	•
SBI: Lower Limit	90.5891	90.5891	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	91.5100	91.5100	0.000	•
SBI: Upper Limit	100.7271	100.7271	0.000	•
SBI: Lower Limit	91.1340	91.1340	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	110.0722	110.0722	0.000	•
SBI: Lower Limit	90.5891	90.5891	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	77.4031	77.4031	0.000	•
TS PCI	86.0957	86.0957	0.000	•
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	•
Interexchange PCI	0.00	NONE	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOR
Transmittal Number: 675
1994 Annual Filing (Filename: GTOR4294)
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TRUNKING	LEC	FCC	Delta	Flag
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	104.6849	104.6849	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	108.7788	108.7788	0.000	•
SBI: Lower Limit	99.4506	99.4506	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
VG, MT, TG				
Proposed SBI	62.56	62.56	-0.000	•
SBI: Upper Limit	68.77	68.77	0.000	•
SBI: Lower Limit	62.22	62.22	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Audio & Video				
Proposed SBI	82.92	82.92	-0.000	•
SBI: Upper Limit	91.14	91.14	0.000	•
SBI: Lower Limit	82.46	82.46	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
HiCap				
DS1				
Prop Sub-Index	62.41	62.41	-0.000	•
Sub-Index Up Lim	68.60	68.60	0.000	•
Sub-Index Low Lim	62.07	62.07	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3				
Prop Sub-Index	78.82	78.82	0.000	•
Sub-Index Up Lim	86.64	86.64	0.000	•
Sub-Index Low Lim	78.39	78.39	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
Total HiCap/DDS				
Proposed SBI	58.79	58.79	-0.000	•
SBI: Upper Limit	65.72	65.72	0.000	•
SBI: Lower Limit	58.46	58.46	-0.000	•
LEC SBI Out?				•
FCC SBI Out?				•
Wideband				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Trunking				
Trunking API	62.01	62.01	0.000	•
Trunking PCI	74.84	74.84	0.000	•
LEC API Above PCI?				LO
FCC API Above PCI?				LO

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOR
Transmittal Number: 875
1994 Annual Filing (Filename: GTOR4294)

	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOR
Transmittal Number: 875
1994 Annual Filing (Filename: GTOR4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTOR
Transmittal Number: 875
1994 Annual Filing (Filename: GTOR4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: GTPA
Transmittal Number: 875
1994 Annual Filing (Filename: GTPA4294)
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$262			
ISW	($24)			
RDA	$0			
EDT	($8)			
ITC	$164			
REMOVAL SHARING/LOW END	$741			
REVISION SHARING/LOW END	$23			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$29			
OTHER	$0			
TOTAL OF INDIVIDUALS	$1,166			
TOTAL EXOGENOUS	$1,166			
COMMON LINE				
Term Prem CCL Rate	0.01952	0.03157	-0.01205	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.08481			
Proposed PCI	106.1125	106.1125	0.0000	*

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ANALYZER
Filing Date: 4/29/94
Filing Entity: GTPA
Transmittal Number: 875
1994 Annual Filing (Filename: GTPA4294)
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	86.0152	86.0152	0.000	*
SBI: Upper Limit	93.2236	93.2236	0.000	*
SBI: Lower Limit	84.3451	84.3451	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	86.5615	86.5615	0.000	*
SBI: Upper Limit	93.8022	93.8022	0.000	*
SBI: Lower Limit	84.8696	84.8696	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.9176	105.9176	0.000	*
SBI: Lower Limit	95.8302	95.8302	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Database Access				
Proposed SBI	90.5600	90.5600	0.000	*
SBI: Upper Limit	95.9189	95.9189	-0.000	*
SBI: Lower Limit	86.7636	86.7636	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.9176	105.9176	0.000	*
SBI: Lower Limit	95.8302	95.8302	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Traffic Sensitive				
TS API	79.9665	79.9665	0.000	*
TS PCI	80.5665	80.5665	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.2518	101.2518	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.2788	103.2788	0.000	*
SBI: Lower Limit	96.1892	96.1892	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	80.78	80.78	0.000	*
SBI: Upper Limit	85.88	85.88	0.000	*
SBI: Lower Limit	77.70	77.70	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	85.69	85.69	0.000	*
SBI: Upper Limit	91.10	91.10	0.000	*
SBI: Lower Limit	82.42	82.42	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	88.84	88.84	0.000	*
Sub-Index Up Lim	94.45	94.45	0.000	*
Sub-Index Low Lim	86.46	86.46	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	80.29	80.29	-0.000	*
Sub-Index Up Lim	85.37	85.37	0.000	*
Sub-Index Low Lim	77.24	77.24	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	85.57	85.57	0.000	*
SBI: Upper Limit	90.97	90.97	0.000	*
SBI: Lower Limit	82.31	82.31	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	83.86	83.86	0.000	*
Trunking PCI	84.97	84.97	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$3			
ISW	$0			
RDA	$0			
EDT	$18			
ITC	$36			
REMOVAL SHARING/LOW END	$332			
REVISION SHARING/LOW END	$72			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$18			
OTHER	$0			
TOTAL OF INDIVIDUALS	$468			
TOTAL EXOGENOUS	$468			
COMMON LINE				
Term Prem CCL Rate	0.01952	0.03177	-0.01226	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.05854			
Proposed PCI	108.1134	108.1134	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.6223	92.6223	0.000	*
SBI: Upper Limit	98.2579	98.2579	0.000	*
SBI: Lower Limit	86.9868	86.9868	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.4609	92.4609	0.000	*
SBI: Upper Limit	98.0867	98.0867	0.000	*
SBI: Lower Limit	86.7451	86.7451	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0845	106.0845	0.000	*
SBI: Lower Limit	95.9612	95.9612	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	93.5800	93.5800	0.000	*
SBI: Upper Limit	99.2739	99.2739	0.000	*
SBI: Lower Limit	88.8182	88.8182	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0845	106.0845	0.000	*
SBI: Lower Limit	95.9612	95.9612	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	82.1986	82.1986	-0.000	*
TS PCI	83.0443	83.0443	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.8712	100.8712	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.8886	102.8886	0.000	*
SBI: Lower Limit	95.8277	95.8277	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.32	72.32	0.000	*
SBI: Upper Limit	76.60	76.60	0.000	*
SBI: Lower Limit	68.31	68.31	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	93.73	93.73	0.000	*
SBI: Upper Limit	93.73	93.73	0.000	*
SBI: Lower Limit	84.80	84.80	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	69.80	69.80	-0.000	*
Sub-Index Up Lim	73.93	73.93	-0.000	*
Sub-Index Low Lim	66.86	66.86	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	82.42	82.42	0.000	*
Sub-Index Up Lim	87.29	87.29	-0.000	*
Sub-Index Low Lim	78.96	78.96	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	68.91	68.91	0.000	*
SBI: Upper Limit	72.99	72.99	-0.000	*
SBI: Lower Limit	66.04	66.04	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	70.54	70.54	0.000	*
Trunking PCI	76.31	76.31	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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		LEC	FCC	Delta	Flag
TRUNKING					
TandemSwitchedTransport Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2					
	Prop $	0.00	NONE	u.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3					
	Prop $	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	Sub-I	0.00	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

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		LEC	FCC	Delta	Flag
TRUNKING					
DS1 Special Access Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

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Filing Entity: GTSC
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		LEC	FCC	Delta	Flag
TRUNKING					
DS3 Special Access Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3					
	Prop $	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	Sub-I	0.0000	NONE	0.000	*
	LEC Sub-Ind Out?				*
	FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$384			
ISW	$114			
RDA	$0			
EDT	$218			
ITC	$414			
REMOVAL SHARING/LOW END	$1,593			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$10,835			
TELECOMM.RELAY SVCS.	$83			
OTHER	$0			
TOTAL OF INDIVIDUALS	$13,649			
TOTAL EXOGENOUS	$13,649			
COMMON LINE				
Term Prem CCL Rate	0.01929	0.03647	-0.01718	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.05350			
Proposed PCI	112.7087	112.7087	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	78.2436	78.2436	-0.000	*
SBI: Upper Limit	86.4793	86.4793	-0.000	*
SBI: Lower Limit	78.2432	78.2432	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	78.2618	78.2618	-0.000	*
SBI: Upper Limit	86.5107	86.5107	0.000	*
SBI: Lower Limit	78.2716	78.2716	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.6323	100.6323	-0.000	*
SBI: Upper Limit	111.2207	111.2207	-0.000	*
SBI: Lower Limit	100.6283	100.6283	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	87.5300	87.5300	0.000	*
SBI: Upper Limit	96.7396	96.7396	0.000	*
SBI: Lower Limit	87.5265	87.5265	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.2042	102.2042	0.000	*
SBI: Upper Limit	111.2207	111.2207	-0.000	*
SBI: Lower Limit	100.6266	100.6266	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	86.2139	86.2139	-0.000	*
TS PCI	80.5470	80.5470	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.6753	105.6753	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.3928	100.3928	0.000	*
SBI: Upper Limit	107.7888	107.7888	0.000	*
SBI: Lower Limit	100.3915	100.3915	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	71.82	71.82	0.000	*
SBI: Upper Limit	79.37	79.37	0.000	*
SBI: Lower Limit	71.82	71.82	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	76.11	76.11	0.000	*
SBI: Upper Limit	84.11	84.11	0.000	*
SBI: Lower Limit	76.10	76.10	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	69.06	69.06	0.000	*
Sub-Index Up Lim	76.31	76.31	0.000	*
Sub-Index Low Lim	69.05	69.05	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	65.64	65.64	0.000	*
Sub-Index Up Lim	72.54	72.54	0.000	*
Sub-Index Low Lim	65.63	65.63	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	65.13	65.13	0.000	*
SBI: Upper Limit	71.96	71.96	0.000	*
SBI: Lower Limit	65.12	65.12	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	68.91	68.91	0.000	*
Trunking PCI	65.70	65.70	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02536			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thou				
SPF	$0			
DEM	$0			
LTS/TRS	$29			
ISW	$0			
RDA	$0			
EDT	($1)			
ITC	$3			
REMOVAL SHARING/LOW END	$65			
REVISION SHARING/LOW END	$14			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$3			
OTHER	$0			
TOTAL OF INDIVIDUALS	$113			
TOTAL EXOGENOUS	$113			
COMMON LINE				
Term Prem CCL Rate	0.02161	0.09262	-0.01061	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.04856			
Proposed PCI	107.6326	107.6326	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.6223	92.6223	0.000	*
SBI: Upper Limit	98.0025	98.0025	0.000	*
SBI: Lower Limit	88.6889	88.6889	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	92.4609	92.4609	0.000	*
SBI: Upper Limit	97.8317	97.8317	0.000	*
SBI: Lower Limit	88.5144	88.5144	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.8087	105.8087	-0.000	*
SBI: Lower Limit	95.7317	95.7317	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	93.5800	93.5800	0.000	*
SBI: Upper Limit	99.0158	99.0158	0.000	*
SBI: Lower Limit	88.5857	88.5857	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	105.8087	105.8087	-0.000	*
SBI: Lower Limit	95.7317	95.7317	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	82.1885	82.1885	0.000	*
TS PCI	82.6284	82.6284	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.9750	100.9750	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.9945	102.9945	0.000	*
SBI: Lower Limit	95.9263	95.9263	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.32	72.32	0.000	*
SBI: Upper Limit	76.68	76.68	-0.000	*
SBI: Lower Limit	68.38	68.38	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	90.45	90.45	-0.000	*
SBI: Upper Limit	93.83	93.83	0.000	*
SBI: Lower Limit	84.89	84.89	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	99.80	99.80	0.000	*
Sub-Index Up Lim	74.00	74.00	0.000	*
Sub-Index Low Lim	66.95	66.95	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	68.85	68.85	0.000	*
SBI: Upper Limit	73.00	73.00	0.000	*
SBI: Lower Limit	66.05	66.05	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	70.51	70.51	-0.000	*
Trunking PCI	74.10	74.10	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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TRUNKING	LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thou				
SPF	$0			
DEM	$0			
LTS/TRS	$102			
ISW	$0			
RDA	$0			
EDT	($24)			
ITC	$148			
REMOVAL SHARING/LOW END	$69			
REVISION SHARING/LOW END	($0)			
SHARING/LOW END ADJ	$4,290			
TELECOMM.RELAY SVCS.	$36			
OTHER	$0			
TOTAL OF INDIVIDUALS	$4,622			
TOTAL EXOGENOUS	$4,622			
COMMON LINE				
Term Prem CCL Rate	0.01952	0.03332	−0.01381	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.06648			
Proposed PCI	108.3787	108.3787	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	86.7216	86.7216	0.000	*
SBI: Upper Limit	95.3619	95.3619	−0.000	*
SBI: Lower Limit	86.2796	86.2796	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	99.8947	99.8947	0.000	*
SBI: Upper Limit	98.8512	98.8512	0.000	*
SBI: Lower Limit	89.4366	89.4366	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	109.9633	109.9633	0.000	*
SBI: Lower Limit	99.4906	99.4906	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	91.5100	91.5100	−0.000	*
SBI: Upper Limit	100.6274	100.6274	0.000	*
SBI: Lower Limit	91.0438	91.0438	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	109.9633	109.9633	0.000	*
SBI: Lower Limit	99.4906	99.4906	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	77.4031	77.4031	0.000	*
TS PCI	85.0115	85.0115	0.000	*
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW
INTEREXCHANGE				
Interexchange API	87.04	87.04	0.000	*
Interexchange PCI	87.04	87.04	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.9666	103.9666	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	106.0459	106.0459	0.000	*
SBI: Lower Limit	98.7663	98.7663	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	62.56	62.56	−0.000	*
SBI: Upper Limit	68.29	68.29	−0.000	*
SBI: Lower Limit	61.79	61.79	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	82.92	82.92	0.000	*
SBI: Upper Limit	90.52	90.52	0.000	*
SBI: Lower Limit	81.90	81.90	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	62.41	62.41	−0.000	*
Sub-Index Up Lim	68.13	68.13	−0.000	*
Sub-Index Low Lim	61.64	61.64	−0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	75.77	75.77	−0.000	*
Sub-Index Up Lim	82.71	82.71	−0.000	*
Sub-Index Low Lim	74.84	74.84	−0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	59.55	59.55	0.000	*
SBI: Upper Limit	65.01	65.01	0.000	*
SBI: Lower Limit	58.82	58.82	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	61.86	61.86	−0.000	*
Trunking PCI	74.09	74.09	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	•
Sub-I	0.00	NONE	0.000	•
Sub-I	0.00	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	•
Sub-I	0.00	NONE	0.000	•
Sub-I	0.00	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	•
Sub-I	0.00	NONE	0.000	•
Sub-I	0.00	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
Sub-I	0.0000	NONE	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$113			
ISW	$0			
RDA	$0			
EDT	$34			
ITC	$61			
REMOVAL SHARING/LOW END	$735			
REVISION SHARING/LOW END	($492)			
SHARING/LOW END ADJ	($450)			
TELECOMM.RELAY SVCS.	$26			
OTHER	$0			
TOTAL OF INDIVIDUALS	$27			
TOTAL EXOGENOUS	$27			
COMMON LINE				
Term Prem CCL Rate	0.01952	0.02998	-0.01046	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.09155			
Proposed PCI	102.8880	102.8880	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	86.3548	86.3548	-0.000	*
SBI: Upper Limit	90.7295	90.7295	0.000	*
SBI: Lower Limit	82.0686	82.0686	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	87.3512	87.3512	0.000	*
SBI: Upper Limit	91.1316	91.1316	-0.000	*
SBI: Lower Limit	82.4524	82.4524	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.3279	104.3279	0.000	*
SBI: Lower Limit	94.3919	94.3919	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	86.9200	86.9200	0.000	*
SBI: Upper Limit	92.7683	92.7683	-0.000	*
SBI: Lower Limit	83.9333	83.9333	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	104.3279	104.3279	0.000	*
SBI: Lower Limit	94.3919	94.3919	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	79.2973	79.2973	0.000	*
TS PCI	79.2975	79.2975	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	98.9757	98.9757	0.000	*
SBI: Upper Limit	99.0781	99.0781	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	-0.000	*
SBI: Upper Limit	101.0587	101.0587	0.000	*
SBI: Lower Limit	94.1242	94.1242	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	88.31	88.31	0.000	*
SBI: Upper Limit	91.87	91.87	0.000	*
SBI: Lower Limit	83.12	83.12	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	89.72	89.72	0.000	*
SBI: Upper Limit	89.81	89.81	0.000	*
SBI: Lower Limit	81.26	81.26	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	75.82	75.82	-0.000	*
Sub-Index Up Lim	78.87	78.87	0.000	*
Sub-Index Low Lim	71.36	71.36	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	77.56	77.56	0.000	*
Sub-Index Up Lim	80.69	80.69	0.000	*
Sub-Index Low Lim	73.01	73.01	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	75.16	75.16	-0.000	*
SBI: Upper Limit	78.19	78.19	0.000	*
SBI: Lower Limit	70.74	70.74	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	81.66	81.66	0.000	*
Trunking PCI	81.82	81.82	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($36)			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	($743)			
REMOVAL SHARING/LOW END	($610)			
REVISION SHARING/LOW END	($1,042)			
SHARING/LOW END ADJ	$6			
TELECOMM.RELAY SVCS.	$0			
OTHER	($2,606)			
TOTAL OF INDIVIDUALS	($2,606)			
TOTAL EXOGENOUS				
COMMON LINE				
Term Prem CCL Rate	0.02757	0.02757	0.00000	•
Orig Prem CCL Rate	0.01000	0.01000	0.00000	•
g	0.21981			
Proposed PCI	85.9083	85.9083	0.0000	•

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	85.8637	85.8637	0.000	•
SBI: Upper Limit	89.0838	89.0838	−0.000	•
SBI: Lower Limit	82.5044	82.5044	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	67.1678	67.1678	0.000	•
SBI: Upper Limit	67.5293	67.5293	0.000	•
SBI: Lower Limit	61.0979	61.0979	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	94.9667	94.9665	0.000	•
SBI: Upper Limit	95.0170	95.0170	−0.000	•
SBI: Lower Limit	85.9678	85.9678	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	71.0000	71.0000	0.000	•
SBI: Upper Limit	71.2628	71.2628	0.000	•
SBI: Lower Limit	64.4758	64.4758	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	94.9141	94.9141	0.000	•
SBI: Upper Limit	95.0170	95.0170	−0.000	•
SBI: Lower Limit	85.9678	85.9678	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	84.9586	84.9586	−0.000	•
TS PCI	84.9740	84.9740	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	•
Interexchange PCI	0.00	NONE	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	88.2105	88.2105	−0.000	•
SBI: Upper Limit	88.3607	88.3607	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Tandem Switched Transport				
Proposed SBI	89.0425	89.0425	0.000	•
SBI: Upper Limit	90.1279	90.1279	−0.000	•
SBI: Lower Limit	83.9426	83.9426	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
VG, MT, TG				
Proposed SBI	82.15	82.15	−0.000	•
SBI: Upper Limit	84.86	84.86	−0.000	•
SBI: Lower Limit	76.78	76.78	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Audio & Video				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
HiCap				
DS1				
Prop Sub−Index	77.60	77.60	0.000	•
Sub−Index Up Lim	85.77	85.77	0.000	•
Sub−Index Low Lim	77.60	77.60	0.000	•
LEC Sub−Ind Out?				•
FCC Sub−Ind Out?				•
DS3				
Prop Sub−Index	0.00	NONE	0.000	•
Sub−Index Up Lim	0.00	NONE	0.000	•
Sub−Index Low Lim	0.00	NONE	0.000	•
LEC Sub−Ind Out?				•
FCC Sub−Ind Out?				•
Total HiCap/DDS				
Proposed SBI	81.11	81.11	0.000	•
SBI: Upper Limit	84.89	84.89	−0.000	•
SBI: Lower Limit	76.80	76.80	−0.000	•
LEC SBI Out?				•
FCC SBI Out?				•
Wideband				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Trunking				
Trunking API	81.10	81.10	0.000	•
Trunking PCI	81.10	81.10	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$19			
ISW	$0			
RDA	$0			
EDT	($1)			
ITC	$8			
REMOVAL SHARING/LOW END	($1,145)			
REVISION SHARING/LOW END	($864)			
SHARING/LOW END ADJ	($1,541)			
TELECOMM.RELAY SVCS.	$12			
OTHER	$0			
TOTAL OF INDIVIDUALS	($3,511)			
TOTAL EXOGENOUS	($3,511)			
COMMON LINE				
Term Prem CCL Rate	0.06260	0.06260	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.19339			
Proposed PCI	99.0227	99.0227	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching	99.4109	99.4109	0.000	*
Proposed SBI	73.0679	73.0679	0.000	*
SBI: Upper Limit	66.1090	66.1090	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Information	71.0300	71.0300	-0.000	*
Proposed SBI	71.1201	71.1201	0.000	*
SBI: Upper Limit	64.3467	64.3467	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Database Access	91.6667	91.6668	-0.000	*
Vert.Services: SBI	91.7035	91.7035	0.000	*
SBI: Upper Limit	82.9666	82.9666	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Database Access	77.0000	77.0000	-0.000	*
Proposed SBI	77.0300	77.0300	-0.000	*
SBI: Upper Limit	69.6946	69.6946	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Billing Name and Address	99.6765	99.6765	-0.000	*
Proposed SBI	91.7035	91.7035	0.000	*
SBI: Upper Limit	82.9666	82.9666	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Traffic Sensitive	99.2439	99.2439	-0.000	*
TS API	99.2766	99.2766	-0.000	*
TS PCI				*
LEC API Above PCI?				
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge	88.5257	88.5257	-0.000	*
Proposed SBI	88.5748	88.5748	0.000	*
SBI: Upper Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Tandem Switched Transport	84.5521	84.5521	0.000	*
Proposed SBI	90.3463	90.3463	-0.000	*
SBI: Upper Limit	84.1461	84.1461	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
VG, MT, TG	79.81	79.81	0.000	*
Proposed SBI	80.32	80.32	-0.000	*
SBI: Upper Limit	72.67	72.67	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Audio & Video	91.40	91.40	-0.000	*
Proposed SBI	93.00	93.00	0.000	*
SBI: Upper Limit	84.15	84.15	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
HiCap				
DS1	71.37	71.37	-0.000	*
Prop Sub-Index	78.80	78.80	0.000	*
Sub-Index Up Lim	71.30	71.30	-0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3	0.00	NONE	0.000	*
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
Total HiCap/DDS	72.72	72.72	-0.000	*
Proposed SBI	78.64	78.64	-0.000	*
SBI: Upper Limit	71.15	71.15	0.000	*
SBI: Lower Limit				*
LEC SBI Out?				
FCC SBI Out?				
Wideband	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Trunking	76.01	76.01	-0.000	*
Trunking API	76.01	76.01	0.000	*
Trunking PCI				*
LEC API Above PCI?				
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$0			
ISW	$0			
RDA	$0			
EDT	$2			
ITC	$3			
REMOVAL SHARING/LOW END	($129)			
REVISION SHARING/LOW END	($27)			
SHARING/LOW END ADJ	($122)			
TELECOMM.RELAY SVCS.	$1			
OTHER	$0			
TOTAL OF INDIVIDUALS	($263)			
TOTAL EXOGENOUS	($263)			
COMMON LINE				
Term Prem CCL Rate	0.05964	0.04817	-0.01153	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	-0.12254			
Proposed PCI	114.0970	114.0970	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	70.8865	70.8865	0.000	*
SBI: Upper Limit	74.3564	74.3564	0.000	*
SBI: Lower Limit	67.2748	67.2748	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	66.9669	66.9669	0.000	*
SBI: Upper Limit	69.9557	69.9557	0.000	*
SBI: Lower Limit	63.2932	63.2932	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	86.9563	86.9563	0.000	*
SBI: Upper Limit	87.1306	87.1306	0.000	*
SBI: Lower Limit	78.8326	78.8326	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	80.0000	80.0000	0.000	*
SBI: Upper Limit	80.1603	80.1603	-0.000	*
SBI: Lower Limit	72.5290	72.5290	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	67.4526	67.4526	-0.000	*
TS PCI	67.4814	67.4814	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	93.1989	93.1989	0.000	*
SBI: Upper Limit	93.2994	93.2994	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	93.1759	93.1759	0.000	*
SBI: Upper Limit	95.1348	95.1348	0.000	*
SBI: Lower Limit	88.6060	88.6060	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	84.95	84.95	-0.000	*
SBI: Upper Limit	85.92	85.92	-0.000	*
SBI: Lower Limit	77.74	77.74	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	81.16	81.16	-0.000	*
Sub-Index Up Lim	82.77	82.77	-0.000	*
Sub-Index Low Lim	74.89	74.89	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	80.34	80.34	0.000	*
SBI: Upper Limit	81.65	81.65	-0.000	*
SBI: Lower Limit	73.87	73.87	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	79.51	79.51	0.000	*
Trunking PCI	79.51	79.51	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$119			
ISW	$0			
RDA	$0			
EDT	$39			
ITC	$35			
REMOVAL SHARING/LOW END	($3,991)			
REVISION SHARING/LOW END	($544)			
SHARING/LOW END ADJ	($2,815)			
TELECOMM.RELAY SVCS.	$25			
OTHER	$0			
TOTAL OF INDIVIDUALS	($6,841)			
TOTAL EXOGENOUS	($6,841)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.03861	−0.00197	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.13519			
Proposed PCI	101.5258	101.5253	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	79.3165	79.3165	0.000	*
SBI: Upper Limit	83.1896	83.1896	−0.000	*
SBI: Lower Limit	75.2659	75.2659	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	77.3422	77.3422	−0.000	*
SBI: Upper Limit	78.2652	78.2652	0.000	*
SBI: Lower Limit	70.8113	70.8113	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	98.7391	98.7391	−0.000	*
SBI: Upper Limit	97.4804	97.4804	−0.000	*
SBI: Lower Limit	88.1986	88.1986	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	89.0000	89.0000	−0.000	*
SBI: Upper Limit	89.6820	89.6820	0.000	*
SBI: Lower Limit	81.1406	81.1406	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	75.4680	75.4680	−0.000	*
TS PCI	75.4870	75.4870	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	86.7712	86.7712	0.000	*
SBI: Upper Limit	86.8255	86.8255	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	87.7055	87.7055	−0.000	*
SBI: Upper Limit	88.5620	88.5620	−0.000	*
SBI: Lower Limit	82.4843	82.4843	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	78.80	78.80	−0.000	*
SBI: Upper Limit	79.96	79.96	−0.000	*
SBI: Lower Limit	72.37	72.37	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	78.16	78.16	−0.000	*
SBI: Upper Limit	78.62	78.62	0.000	*
SBI: Lower Limit	71.13	71.13	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	71.57	71.57	0.000	*
Sub−Index Up Lim	77.05	77.05	0.000	*
Sub−Index Low Lim	66.72	66.72	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	90.87	90.87	0.000	*
Sub−Index Up Lim	91.17	91.17	0.000	*
Sub−Index Low Lim	82.48	82.48	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	71.86	71.86	−0.000	*
SBI: Upper Limit	76.01	76.01	−0.000	*
SBI: Lower Limit	66.77	66.77	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	74.00	74.00	−0.000	*
Trunking PCI	74.00	74.00	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02936			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($8)			
ISW	$0			
RDA	$0			
EDT	$21			
ITC	$6			
REMOVAL SHARING/LOW END	($1,012)			
REVISION SHARING/LOW END	($939)			
SHARING/LOW END ADJ	($1,406)			
TELECOMM.RELAY SVCS.	$14			
OTHER	$0			
TOTAL OF INDIVIDUALS	($3,326)			
TOTAL EXOGENOUS	($3,326)			
COMMON LINE				
Term Prem CCL Rate	0.09664	0.04627	-0.00963	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.09359			
Proposed PCI	108.4167	108.4167	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	70.6859	70.6859	-0.000	*
SBI: Upper Limit	74.1645	74.1645	0.000	*
SBI: Lower Limit	67.1012	67.1012	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	70.2212	70.2212	0.000	*
SBI: Upper Limit	72.1875	72.1875	0.000	*
SBI: Lower Limit	65.3125	65.3125	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	92.8571	92.8572	-0.000	*
SBI: Upper Limit	93.0798	93.0798	0.000	*
SBI: Lower Limit	84.2150	84.2150	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	78.0000	78.0000	-0.000	*
SBI: Upper Limit	78.1870	78.1870	-0.000	*
SBI: Lower Limit	70.7406	70.7406	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	92.7586	92.7586	-0.000	*
SBI: Upper Limit	93.0798	93.0798	0.000	*
SBI: Lower Limit	84.2150	84.2150	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	67.2616	67.2616	0.000	*
TS PCI	67.2735	67.2735	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	88.2972	88.2972	-0.000	*
SBI: Upper Limit	88.3656	88.3656	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	89.9516	89.9516	0.000	*
SBI: Upper Limit	90.1331	90.1331	-0.000	*
SBI: Lower Limit	83.9475	83.9475	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	75.88	75.88	0.000	*
SBI: Upper Limit	80.13	80.13	-0.000	*
SBI: Lower Limit	72.50	72.50	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	74.35	74.35	-0.000	*
Sub-Index Up Lim	78.61	78.61	-0.000	*
Sub-Index Low Lim	71.13	71.13	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	91.62	91.62	-0.000	*
Sub-Index Up Lim	92.78	92.78	-0.000	*
Sub-Index Low Lim	83.95	83.95	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	75.04	75.04	-0.000	*
SBI: Upper Limit	78.46	78.46	-0.000	*
SBI: Lower Limit	70.98	70.98	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	75.79	75.79	0.000	*
Trunking PCI	75.79	75.79	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES In thous				
SPF	$0			
DEM	$0			
LTS/TRS	($27)			
ISW	$0			
RDA	$0			
EDT	$38			
ITC	$21			
REMOVAL SHARING/LOW END	($936)			
REVISION SHARING/LOW END	($906)			
SHARING/LOW END ADJ	($1,390)			
TELECOMM.RELAY SVCS.	$11			
OTHER	$0			
TOTAL OF INDIVIDUALS	($3,181)			
TOTAL EXOGENOUS	($3,181)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.04683	-0.01019	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02031			
Proposed PCI	110.8589	110.8589	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	71.5604	71.5604	0.000	*
SBI: Upper Limit	75.2403	75.2403	-0.000	*
SBI: Lower Limit	68.0746	68.0746	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	72.7801	72.7801	-0.000	*
SBI: Upper Limit	73.2347	73.2347	0.000	*
SBI: Lower Limit	66.2589	66.2589	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	92.6120	92.6120	0.000	*
SBI: Upper Limit	94.4300	94.4300	-0.000	*
SBI: Lower Limit	85.4367	85.4367	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	68.2305	68.2305	-0.000	*
TS PCI	66.2494	66.2495	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	85.8650	85.8650	-0.000	*
SBI: Upper Limit	88.0093	88.0093	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	84.9757	84.9757	-0.000	*
SBI: Upper Limit	87.7295	87.7295	0.000	*
SBI: Lower Limit	81.7068	81.7068	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	77.43	77.43	0.000	*
SBI: Upper Limit	77.99	77.99	0.000	*
SBI: Lower Limit	70.56	70.56	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	89.46	89.46	-0.000	*
SBI: Upper Limit	90.31	90.31	-0.000	*
SBI: Lower Limit	81.71	81.71	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	70.78	70.78	-0.000	*
Sub-Index Up Lim	76.52	76.52	0.000	*
Sub-Index Low Lim	69.23	69.23	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	89.65	89.65	-0.000	*
Sub-Index Up Lim	90.31	90.31	-0.000	*
Sub-Index Low Lim	81.71	81.71	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	71.96	71.96	0.000	*
SBI: Upper Limit	76.36	76.36	0.000	*
SBI: Lower Limit	69.09	69.09	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	73.79	73.79	-0.000	*
Trunking PCI	73.80	73.80	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02536			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTB/TRS	($81)			
ISW	$0			
RDA	$0			
EDT	$30			
ITC	$25			
REMOVAL SHARING/LOW END	($827)			
REVISION SHARING/LOW END	($722)			
SHARING/LOW END ADJ	($1,278)			
TELECOMM.RELAY SVCS.	$10			
OTHER	$0			
TOTAL OF INDIVIDUALS	($2,794)			
TOTAL EXOGENOUS	($2,794)			
COMMON LINE				
Term Prem CCL Rate	0.09664	0.04271	−0.00607	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.21707			
Proposed PCI	102.6661	102.6661	−0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	69.6236	69.6236	−0.000	*
SBI: Upper Limit	73.2162	73.2162	−0.000	*
SBI: Lower Limit	66.2432	66.2432	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	71.0647	71.0647	0.000	*
SBI: Upper Limit	71.2645	71.2645	0.000	*
SBI: Lower Limit	64.4774	64.4774	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	91.6667	91.6667	0.000	*
SBI: Upper Limit	91.8667	91.8667	0.000	*
SBI: Lower Limit	83.1383	83.1383	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	77.0000	77.0000	0.000	*
SBI: Upper Limit	77.1873	77.1873	−0.000	*
SBI: Lower Limit	69.6362	69.6362	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	91.7667	91.7677	−0.001	*
SBI: Upper Limit	91.8667	91.8667	0.000	*
SBI: Lower Limit	83.1383	83.1383	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	86.3946	86.3946	0.000	*
TS PCI	86.4134	86.4134	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	81.4676	81.4676	0.000	*
SBI: Upper Limit	81.4867	81.4867	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	82.6515	82.6515	−0.000	*
SBI: Upper Limit	83.0691	83.0691	−0.000	*
SBI: Lower Limit	77.3962	77.3962	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	72.70	72.70	−0.000	*
SBI: Upper Limit	73.87	73.87	−0.000	*
SBI: Lower Limit	66.84	66.84	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	73.66	73.66	−0.000	*
SBI: Upper Limit	74.59	74.59	0.000	*
SBI: Lower Limit	67.49	67.49	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	66.11	66.11	0.000	*
Sub-Index Up Lim	72.48	72.48	−0.000	*
Sub-Index Low Lim	65.58	65.58	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	85.16	85.16	0.000	*
Sub-Index Up Lim	85.54	85.54	0.000	*
Sub-Index Low Lim	77.40	77.40	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DS3				
Proposed SBI	67.12	67.12	0.000	*
SBI: Upper Limit	72.33	72.33	0.000	*
SBI: Lower Limit	65.44	65.44	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	88.91	88.91	0.000	*
Trunking PCI	88.91	88.91	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($4)			
ISW	$0			
RDA	$0			
EDT	$6			
ITC	$20			
REMOVAL SHARING/LOW END	($435)			
REVISION SHARING/LOW END	($519)			
SHARING/LOW END ADJ	($781)			
TELECOMM.RELAY SVCS.	$6			
OTHER	$0			
TOTAL OF INDIVIDUALS	($1,708)			
TOTAL EXOGENOUS	($1,708)			
COMMON LINE				
Term Prem CCL Rate	0.03413	0.03413	-0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.19843			
Proposed PCI	92.8150	92.8150	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	67.9538	67.9538	-0.000	*
SBI: Upper Limit	71.2983	71.2983	-0.000	*
SBI: Lower Limit	64.5089	64.5089	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	69.5071	69.5071	-0.000	*
SBI: Upper Limit	69.6949	69.6949	-0.000	*
SBI: Lower Limit	63.0573	63.0573	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	97.3333	97.3337	-0.000	*
SBI: Upper Limit	98.0642	98.0642	0.000	*
SBI: Lower Limit	88.7247	88.7248	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces	73.0000	73.0000	-0.000	*
Proposed SBI	73.5481	73.5481	-0.000	*
SBI: Upper Limit	66.5436	66.5436	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address	97.4657	97.4662	-0.001	*
Proposed SBI	98.0642	98.0642	0.000	*
SBI: Upper Limit	88.7247	88.7248	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive	67.0379	67.0379	0.000	*
TS API	67.0577	67.0577	-0.000	*
TS PCI				*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge	86.4409	86.4409	-0.000	*
Proposed SBI	86.5883	86.5883	-0.000	*
SBI: Upper Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport	87.9010	87.9010	0.000	*
Proposed SBI	88.3201	88.3201	0.000	*
SBI: Upper Limit	82.2589	82.2589	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG	79.82	79.82	0.000	*
Proposed SBI	83.16	83.16	-0.000	*
SBI: Upper Limit	75.24	75.24	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video	83.42	83.42	0.000	*
Proposed SBI	90.92	90.92	-0.000	*
SBI: Upper Limit	82.26	82.26	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1	78.95	78.95	-0.000	*
Prop Sub-Index	84.05	84.05	-0.000	*
Sub-Index Up Lim	76.04	76.04	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3	0.00	NONE	0.000	*
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS	79.52	79.52	-0.000	*
Proposed SBI	83.16	83.16	-0.000	*
SBI: Upper Limit	75.26	75.26	-0.000	*
SBI: Lower Limit				*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking	79.45	79.45	-0.000	*
Trunking API	79.45	79.45	0.000	*
Trunking PCI				*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Transmittal Number: 89
1994 Annual Filing (Filename: COKY4294)

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.08836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($8)			
IBW	$0			
RDA	$0			
EDT	$24			
ITC	$63			
REMOVAL SHARING/LOW END	($543)			
REVISION SHARING/LOW END	($456)			
SHARING/LOW END ADJ	($617)			
TELECOMM.RELAY SVCS.	$4			
OTHER	$0			
TOTAL OF INDIVIDUALS	($1,573)			
TOTAL EXOGENOUS	($1,573)			
COMMON LINE				
Term Prem CCL Rate	0.05366	0.05366	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
Q	0.11851			
Proposed PCI	94.7638	94.7638	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	84.1388	84.1388	0.000	*
SBI: Upper Limit	87.9235	87.9235	0.000	*
SBI: Lower Limit	79.5498	79.5498	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	86.8176	86.8176	0.000	*
SBI: Upper Limit	86.9457	86.9457	-0.000	*
SBI: Lower Limit	78.6662	78.6662	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	92.6316	92.6316	0.000	*
SBI: Upper Limit	93.6617	93.6617	0.000	*
SBI: Lower Limit	84.7415	84.7415	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	88.0000	88.0000	0.000	*
SBI: Upper Limit	88.9786	88.9786	0.000	*
SBI: Lower Limit	80.5044	80.5044	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	92.4567	92.4560	-0.000	*
SBI: Upper Limit	93.6617	93.6617	0.000	*
SBI: Lower Limit	84.7415	84.7415	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	83.6678	83.6678	0.000	*
TS PCI	83.7290	83.7290	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	82.1544	82.1544	-0.000	*
SBI: Upper Limit	82.2000	82.2000	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	83.4535	83.4535	0.000	*
SBI: Upper Limit	83.8439	83.8439	0.000	*
SBI: Lower Limit	78.0900	78.0900	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	83.84	83.84	0.000	*
SBI: Upper Limit	83.85	83.85	0.000	*
SBI: Lower Limit	75.86	75.86	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	78.49	78.49	-0.000	*
Sub-Index Up Lim	86.31	86.31	0.000	*
Sub-Index Low Lim	78.00	78.00	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	77.75	77.75	-0.000	*
SBI: Upper Limit	82.58	82.58	0.000	*
SBI: Lower Limit	74.73	74.73	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	79.97	79.97	-0.000	*
Trunking PCI	79.98	79.98	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: COME
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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES h thous				
SPF	$0			
DEM	$0			
LTS/TRS	$4			
ISW	$0			
RDA	$0			
EDT	$20			
ITC	$18			
REMOVAL SHARING/LOW END	($965)			
REVISION SHARING/LOW END	($532)			
SHARING/LOW END ADJ	($972)			
TELECOMM./RELAY SVCS.	$0			
OTHER	$0			
TOTAL OF INDIVIDUALS	($2,116)			
TOTAL EXOGENOUS	($2,116)			
COMMON LINE				
Term Prem CCL Rate	0.09664	0.09878	-0.00214	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	
g	0.22209			
Proposed PCI	$6.2629	$6.2629	0.0000	

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	69.9303	69.9303	0.000	
SBI: Upper Limit	73.4912	73.4912	-0.000	
SBI: Lower Limit	66.4921	66.4921	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Information				
Proposed SBI	70.9958	70.9958	0.000	
SBI: Upper Limit	71.5322	71.5322	0.000	
SBI: Lower Limit	64.7196	64.7196	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Database Access				
Vert.Services: SBI	91.9667	91.9670	-0.000	
SBI: Upper Limit	92.2348	92.2348	-0.000	
SBI: Lower Limit	83.4506	83.4506	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Database Access				
Proposed SBI	77.0000	77.0001	-0.000	
SBI: Upper Limit	77.4773	77.4773	0.000	
SBI: Lower Limit	70.0985	70.0985	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Billing Name and Address				
Proposed SBI	90.2674	90.2674	-0.000	
SBI: Upper Limit	92.2348	92.2348	-0.000	
SBI: Lower Limit	83.4506	83.4506	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Traffic Sensitive				
TS API	66.6467	66.6467	-0.000	
TS PCI	66.6629	66.6629	0.000	
LEC API Above PCI?				
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	
Interexchange PCI	0.00	NONE	0.000	
LEC API Above PCI?				
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	86.3621	86.3621	0.000	
SBI: Upper Limit	86.5042	86.5042	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Tandem Switched Transport				
Proposed SBI	87.6126	87.6126	0.000	
SBI: Upper Limit	88.2343	88.2343	0.000	
SBI: Lower Limit	82.1790	82.1790	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
VG, MT, TG				
Proposed SBI	77.48	77.48	0.000	
SBI: Upper Limit	78.44	78.44	-0.000	
SBI: Lower Limit	70.97	70.97	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Audio & Video				
Proposed SBI	90.44	90.44	-0.000	
SBI: Upper Limit	90.83	90.83	-0.000	
SBI: Lower Limit	82.18	82.18	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
HiCap				
DS1				
Prop Sub-Index	70.61	70.61	-0.000	
Sub-Index Up Lim	76.96	76.96	0.000	
Sub-Index Low Lim	69.63	69.63	0.000	
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3				
Prop Sub-Index	0.00	NONE	0.000	
Sub-Index Up Lim	0.00	NONE	0.000	
Sub-Index Low Lim	0.00	NONE	0.000	
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
Total HiCap/DDS				
Proposed SBI	71.65	71.65	0.000	
SBI: Upper Limit	76.80	76.80	-0.000	
SBI: Lower Limit	69.49	69.49	0.000	
LEC SBI Out?				
FCC SBI Out?				
Wideband				
Proposed SBI	0.00	NONE	0.000	
SBI: Upper Limit	0.00	NONE	0.000	
SBI: Lower Limit	0.00	NONE	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Trunking				
Trunking API	74.21	74.21	-0.000	
Trunking PCI	74.22	74.22	-0.000	
LEC API Above PCI?				
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: COMN
Transmittal Number: 89
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$136			
ISW	$0			
RDA	$0			
EDT	$11			
ITC	$19			
REMOVAL SHARING/LOW END	($3,656)			
REVISION SHARING/LOW END	($2,793)			
SHARING/LOW END ADJ	($4,585)			
TELECOMM.RELAY SVCS.	$29			
OTHER	$0			
TOTAL OF INDIVIDUALS	($10,839)			
TOTAL EXOGENOUS	($10,839)			
COMMON LINE				
Term Prem CCL Rate	0.02521	0.02521	-0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.23002			
Proposed PCI	79.0354	79.0354	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	70.8131	70.8131	-0.000	*
SBI: Upper Limit	72.2165	72.2165	-0.000	*
SBI: Lower Limit	65.3366	65.3366	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	70.0376	70.0376	0.000	*
SBI: Upper Limit	70.2914	70.2914	-0.000	*
SBI: Lower Limit	63.5970	63.5970	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	90.4762	90.4762	-0.000	*
SBI: Upper Limit	90.6350	90.6350	-0.000	*
SBI: Lower Limit	82.0031	82.0031	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	76.0000	76.0000	-0.000	*
SBI: Upper Limit	76.1334	76.1334	-0.000	*
SBI: Lower Limit	68.8826	68.8826	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	89.9259	89.9259	-0.000	*
SBI: Upper Limit	90.6350	90.6350	-0.000	*
SBI: Lower Limit	82.0031	82.0031	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	65.4876	65.4876	-0.000	*
TS PCI	65.5066	65.5066	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	88.0084	88.0084	-0.000	*
SBI: Upper Limit	88.0312	88.0312	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	89.5065	89.5065	-0.000	*
SBI: Upper Limit	89.7918	89.7918	0.000	*
SBI: Lower Limit	83.6296	83.6296	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	78.77	78.77	-0.000	*
SBI: Upper Limit	79.82	79.82	0.000	*
SBI: Lower Limit	72.22	72.22	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	77.71	77.71	0.000	*
SBI: Upper Limit	80.60	80.60	-0.000	*
SBI: Lower Limit	72.92	72.92	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	78.08	78.08	0.000	*
Sub-Index Up Lim	78.32	78.32	0.000	*
Sub-Index Low Lim	70.86	70.86	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	90.81	90.81	0.000	*
Sub-Index Up Lim	92.43	92.43	0.000	*
Sub-Index Low Lim	83.63	83.63	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	78.00	78.00	0.000	*
SBI: Upper Limit	78.16	78.16	-0.000	*
SBI: Lower Limit	70.71	70.71	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	77.01	77.01	0.000	*
Trunking PCI	77.01	77.01	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$21			
ISW	$0			
RDA	$0			
EDT	$22			
ITC	$33			
REMOVAL SHARING/LOW END	($815)			
REVISION SHARING/LOW END	($781)			
SHARING/LOW END ADJ	($1,107)			
TELECOMM.RELAY SVCS.	$10			
OTHER	$0			
TOTAL OF INDIVIDUALS	($2,417)			
TOTAL EXOGENOUS	($2,417)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.03763	−0.00099	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.14236			
Proposed PCI	96.5739	96.5739	−0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	68.5139	68.5139	0.000	*
SBI: Upper Limit	71.8325	71.8325	−0.000	*
SBI: Lower Limit	64.9913	64.9913	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	69.5087	69.5087	−0.000	*
SBI: Upper Limit	70.2161	70.2161	0.000	*
SBI: Lower Limit	63.5288	63.5288	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	96.6667	96.6668	−0.000	*
SBI: Upper Limit	98.7975	98.7975	−0.000	*
SBI: Lower Limit	89.3662	89.3662	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	74.0000	74.0000	−0.000	*
SBI: Upper Limit	74.0661	74.0661	−0.000	*
SBI: Lower Limit	67.0412	67.0412	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	97.5216	97.5221	−0.000	*
SBI: Upper Limit	98.7975	98.7975	−0.000	*
SBI: Lower Limit	89.3662	89.3662	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	67.5456	67.5456	0.000	*
TS PCI	67.5562	67.5562	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	87.1901	87.1901	0.000	*
SBI: Upper Limit	87.4164	87.4164	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	88.8854	88.8854	−0.000	*
SBI: Upper Limit	89.1647	89.1647	0.000	*
SBI: Lower Limit	83.0456	83.0456	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	83.90	83.90	−0.000	*
SBI: Upper Limit	83.95	83.95	0.000	*
SBI: Lower Limit	75.96	75.96	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	78.77	78.77	0.000	*
SBI: Upper Limit	81.93	81.93	0.000	*
SBI: Lower Limit	74.12	74.12	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	78.06	78.06	0.000	*
Sub−Index Up Lim	84.85	84.85	0.000	*
Sub−Index Low Lim	76.77	76.77	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	0.00	NONE	0.000	*
Sub−Index Up Lim	0.00	NONE	0.000	*
Sub−Index Low Lim	0.00	NONE	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	78.78	78.78	0.000	*
SBI: Upper Limit	83.98	83.98	−0.000	*
SBI: Lower Limit	75.98	75.98	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	80.26	80.26	0.000	*
Trunking PCI	80.26	80.26	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02934			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($10)			
IBW	$0			
RDA	$0			
EDT	$11			
ITC	$20			
REMOVAL SHARING/LOW END	($190)			
REVISION SHARING/LOW END	($151)			
SHARING/LOW END ADJ	($174)			
TELECOMM.RELAY SVCS.	$2			
OTHER	$0			
TOTAL OF INDIVIDUALS	($483)			
TOTAL EXOGENOUS	($483)			
COMMON LINE				
Term Prem CCL Rate	0.08864	0.04219	-0.00555	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	
g	0.18295			
Proposed PCI	100.1971	100.1971	0.0000	

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	77.8847	77.8847	0.000	
SBI: Upper Limit	81.3782	81.3782	-0.000	
SBI: Lower Limit	73.6279	73.6279	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Information				
Proposed SBI	79.7934	79.7934	-0.000	
SBI: Upper Limit	80.4733	80.4733	0.000	
SBI: Lower Limit	72.8891	72.8891	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Database Access				
Vert.Services: SBI	0.0000	NONE	0.000	
SBI: Upper Limit	0.0000	NONE	0.000	
SBI: Lower Limit	0.0000	NONE	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Database Access				
Proposed SBI	0.0000	NONE	0.000	
SBI: Upper Limit	0.0000	NONE	0.000	
SBI: Lower Limit	0.0000	NONE	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Billing Name and Address				
Proposed SBI	85.1208	85.1208	0.000	
SBI: Upper Limit	86.6662	86.6662	-0.000	
SBI: Lower Limit	78.4331	78.4331	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Traffic Sensitive				
TS API	77.4723	77.4723	0.000	
TS PCI	77.4951	77.4950	0.000	
LEC API Above PCI?				
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	
Interexchange PCI	0.00	NONE	0.000	
LEC API Above PCI?				
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	83.3650	83.3650	-0.000	
SBI: Upper Limit	83.4660	83.4660	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Tandem Switched Transport				
Proposed SBI	84.5702	84.5702	-0.000	
SBI: Upper Limit	85.1373	85.1373	-0.000	
SBI: Lower Limit	79.2946	79.2946	-0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
VG, MT, TG				
Proposed SBI	78.37	78.37	0.000	
SBI: Upper Limit	85.14	85.14	-0.000	
SBI: Lower Limit	77.03	77.03	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Audio & Video				
Proposed SBI	0.00	NONE	0.000	
SBI: Upper Limit	0.00	NONE	0.000	
SBI: Lower Limit	0.00	NONE	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
HiCap				
DS1				
Prop Sub-Index	85.29	85.29	0.000	
Sub-Index Up Lim	85.62	85.62	-0.000	
Sub-Index Low Lim	77.47	77.47	-0.000	
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3				
Prop Sub-Index	0.00	NONE	0.000	
Sub-Index Up Lim	0.00	NONE	0.000	
Sub-Index Low Lim	0.00	NONE	0.000	
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
Total HiCap/DDS				
Proposed SBI	81.67	81.67	-0.000	
SBI: Upper Limit	83.87	83.87	-0.000	
SBI: Lower Limit	75.86	75.86	-0.000	
LEC SBI Out?				
FCC SBI Out?				
Wideband				
Proposed SBI	0.00	NONE	0.000	
SBI: Upper Limit	0.00	NONE	0.000	
SBI: Lower Limit	0.00	NONE	0.000	
LEC SBI Out Bounds?				
FCC SBI Out Bounds?				
Total Trunking				
Trunking API	81.06	81.06	0.000	
Trunking PCI	81.06	81.06	-0.000	
LEC API Above PCI?				
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$4			
ISW	$0			
RDA	$0			
EDT	$2			
ITC	$35			
REMOVAL SHARING/LOW END	$10			
REVISION SHARING/LOW END	($331)			
SHARING/LOW END ADJ	($756)			
TELECOMM.RELAY SVCS.	$4			
OTHER	$0			
TOTAL OF INDIVIDUALS	($1,043)			
TOTAL EXOGENOUS	($1,043)			
COMMON LINE				
Term Prem CCL Rate	0.09984	0.09741	−0.00077	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.32648			
Proposed PCI	93.0799	93.0799	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	89.2079	89.2079	−0.000	*
SBI: Upper Limit	92.4315	92.4315	−0.000	*
SBI: Lower Limit	83.6285	83.6285	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	91.9033	91.9033	0.000	*
SBI: Upper Limit	92.1480	92.1480	0.000	*
SBI: Lower Limit	83.3702	83.3702	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.2640	100.2640	−0.000	*
SBI: Lower Limit	90.7151	90.7151	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	94.0000	94.0000	0.000	*
SBI: Upper Limit	94.2482	94.2482	0.000	*
SBI: Lower Limit	85.2722	85.2722	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	89.3053	89.3053	0.000	*
TS PCI	89.3185	89.3185	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	91.2503	91.2503	0.000	*
SBI: Upper Limit	91.2796	91.2796	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	92.9002	92.9002	0.000	*
SBI: Upper Limit	93.1052	93.1052	0.000	*
SBI: Lower Limit	86.7157	86.7157	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	86.87	86.87	0.000	*
SBI: Upper Limit	86.93	86.93	−0.000	*
SBI: Lower Limit	80.46	80.46	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	87.16	87.16	−0.000	*
Sub−Index Up Lim	87.45	87.45	−0.000	*
Sub−Index Low Lim	79.12	79.12	−0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	0.00	NONE	0.000	*
Sub−Index Up Lim	0.00	NONE	0.000	*
Sub−Index Low Lim	0.00	NONE	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	86.83	86.83	0.000	*
SBI: Upper Limit	86.84	86.84	0.000	*
SBI: Lower Limit	78.57	78.57	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	84.86	84.86	−0.000	*
Trunking PCI	85.23	85.23	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	($150)			
DEM	$0			
LTS/TRS	$28			
ISW	$0			
RDA	$0			
EDT	($2)			
ITC	$0			
REMOVAL SHARING/LOW END	($442)			
REVISION SHARING/LOW END	($62)			
SHARING/LOW END ADJ	($310)			
TELECOMM.RELAY SVCS.	$2			
OTHER	$0			
TOTAL OF INDIVIDUALS	($938)			
TOTAL EXOGENOUS	($937)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.04826	-0.01164	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.10721			
Proposed PCI	108.7756	108.7756	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	75.8019	75.8019	0.000	*
SBI: Upper Limit	79.5039	79.5039	0.000	*
SBI: Lower Limit	71.9321	71.9321	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	74.7007	74.7007	-0.000	*
SBI: Upper Limit	74.7985	74.7985	-0.000	*
SBI: Lower Limit	67.6748	67.6748	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	92.3913	92.3913	0.000	*
SBI: Upper Limit	93.1626	93.1626	-0.000	*
SBI: Lower Limit	84.2900	84.2900	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	85.0000	85.0000	0.000	*
SBI: Upper Limit	85.7096	85.7096	-0.000	*
SBI: Lower Limit	77.5468	77.5468	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	0.0000	NONE	0.000	*
SBI: Upper Limit	0.0000	NONE	0.000	*
SBI: Lower Limit	0.0000	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	72.1448	72.1448	0.000	*
TS PCI	72.1536	72.1536	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	89.6963	89.6963	-0.000	*
SBI: Upper Limit	89.7931	89.7931	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	88.7701	88.7701	-0.000	*
SBI: Upper Limit	91.5889	91.5889	-0.000	*
SBI: Lower Limit	85.9034	85.9034	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	82.37	82.37	0.000	*
SBI: Upper Limit	82.72	82.72	0.000	*
SBI: Lower Limit	74.84	74.84	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	79.61	79.61	-0.000	*
Sub-Index Up Lim	79.69	79.69	-0.000	*
Sub-Index Low Lim	72.10	72.10	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	78.58	78.58	-0.000	*
SBI: Upper Limit	78.61	78.61	0.000	*
SBI: Lower Limit	71.12	71.12	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	76.58	76.58	-0.000	*
Trunking PCI	76.58	76.58	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$27			
ISW	$0			
RDA	$0			
EDT	($0)			
ITC	$4			
REMOVAL SHARING/LOW END	($23)			
REVISION SHARING/LOW END	($11)			
SHARING/LOW END ADJ	($574)			
TELECOMM.RELAY SVCS.	$3			
OTHER	$0			
TOTAL OF INDIVIDUALS	($575)			
TOTAL EXOGENOUS	($575)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.05111	−0.01447	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	−0.07504			
Proposed PCI	116.0082	116.0082	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	67.5617	67.5617	0.000	*
SBI: Upper Limit	70.9943	70.9943	−0.000	*
SBI: Lower Limit	64.2329	64.2329	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	69.7113	69.7113	−0.000	*
SBI: Upper Limit	69.7745	69.7745	0.000	*
SBI: Lower Limit	63.1293	63.1293	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	94.8052	94.8082	−0.003	*
SBI: Upper Limit	95.3891	95.3891	−0.000	*
SBI: Lower Limit	86.3044	86.3044	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces				
Proposed SBI	73.0000	73.0004	−0.000	*
SBI: Upper Limit	73.4496	73.4496	−0.000	*
SBI: Lower Limit	66.4544	66.4544	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	95.0000	95.0000	0.000	*
SBI: Upper Limit	95.3891	95.3891	−0.000	*
SBI: Lower Limit	86.3044	86.3044	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	66.6506	66.6506	−0.000	*
TS PCI	66.6765	66.6765	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	87.5366	87.5366	0.000	*
SBI: Upper Limit	87.5516	87.5516	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	89.0147	89.0147	−0.000	*
SBI: Upper Limit	89.3026	89.3026	−0.000	*
SBI: Lower Limit	83.1740	83.1740	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	68.23	68.23	0.000	*
SBI: Upper Limit	71.96	71.96	−0.000	*
SBI: Lower Limit	65.11	65.11	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	68.07	68.07	−0.000	*
Sub−Index Up Lim	72.12	72.12	−0.000	*
Sub−Index Low Lim	65.25	65.25	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	0.00	NONE	0.000	*
Sub−Index Up Lim	0.00	NONE	0.000	*
Sub−Index Low Lim	0.00	NONE	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	68.23	68.23	−0.000	*
SBI: Upper Limit	72.20	72.20	−0.000	*
SBI: Lower Limit	65.32	65.32	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	66.67	66.67	0.000	*
Trunking PCI	66.67	66.67	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$32			
LTS/TRS	$0			
ISW	$0			
RDA	$11			
EDT	$38			
ITC	$1,809			
REMOVAL SHARING/LOW END	$545			
REVISION SHARING/LOW END	($1,660)			
SHARING/LOW END ADJ	$7			
TELECOMM.RELAY SVCS.	$0			
OTHER	$542			
TOTAL OF INDIVIDUALS	$542			
TOTAL EXOGENOUS				
COMMON LINE				
Term Prem CCL Rate	0.08964	0.05958	-0.02294	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
9	0.14277			
Proposed PCI	124.4800	124.4800	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	72.3038	72.3038	0.000	*
SBI: Upper Limit	77.9958	77.9958	0.000	*
SBI: Lower Limit	70.5677	70.5677	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	71.4224	71.4224	0.000	*
SBI: Upper Limit	77.0450	77.0450	0.000	*
SBI: Lower Limit	69.7074	69.7074	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	107.8723	107.8723	-0.000	*
SBI: Lower Limit	97.5068	97.5068	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	70.0000	70.0000	0.000	*
SBI: Upper Limit	75.5106	75.5106	-0.000	*
SBI: Lower Limit	68.3191	68.3191	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	107.8723	107.8723	-0.000	*
SBI: Lower Limit	97.5068	97.5068	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive	71.5282	71.5282	0.000	*
TS API	73.6054	73.6054	0.000	*
TS PCI				LOW
LEC API Above PCI?				LOW
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge	98.9991	98.9991	0.000	*
Proposed SBI	99.4643	99.4643	0.000	*
SBI: Upper Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Tandem Switched Transport	100.0000	100.0000	0.000	*
Proposed SBI	101.4536	101.4536	-0.000	*
SBI: Upper Limit	94.4911	94.4911	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
VG, MT, TG	58.01	58.01	0.000	*
Proposed SBI	61.51	61.51	0.000	*
SBI: Upper Limit	55.65	55.65	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Audio & Video	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
HiCap				
DS1	68.27	68.27	0.000	*
Prop Sub-Index	71.05	71.05	0.000	*
Sub-Index Up Lim	64.28	64.28	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3	0.00	NONE	0.000	*
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
Total HiCap/DDS	68.69	68.69	0.000	*
Proposed SBI	71.53	71.53	0.000	*
SBI: Upper Limit	64.72	64.72	0.000	*
SBI: Lower Limit				*
LEC SBI Out?				*
FCC SBI Out?				
Wideband	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Trunking	62.90	62.90	0.000	*
Trunking API	62.90	62.90	0.000	*
Trunking PCI				*
LEC API Above PCI?				*
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	($9)			
LTS/TRS	$0			
ISW	$0			
RDA	$0			
EDT	$7			
ITC	($53)			
REMOVAL SHARING/LOW END	($107)			
REVISION SHARING/LOW END ADJ	($173)			
SHARING/LOW END ADJ	$1			
TELECOMM.RELAY SVCS.	$0			
OTHER	($333)			
TOTAL OF INDIVIDUALS	($333)			
TOTAL EXOGENOUS				
COMMON LINE				
Term Prem CCL Rate	0.03664	0.04960	-0.01296	LOW *
Orig Prem CCL Rate	0.01000	0.01000	0.00000	
g	0.04066			*
Proposed PCI	112.7684	112.7684	0.0000	

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching	61.0541	61.0541	0.000	*
Proposed SBI	64.0911	64.0911	0.000	*
SBI: Upper Limit	57.9672	57.9672	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Information	62.4797	62.4797	-0.000	*
Proposed SBI	62.6489	62.6489	0.000	*
SBI: Upper Limit	56.6823	56.6823	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Database Access	88.0000	87.9967	0.003	*
Vert.Services: SBI	88.1501	88.1501	0.000	*
SBI: Upper Limit	79.7548	79.7548	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Database Access	66.0000	65.9966	0.000	*
Proposed SBI	66.1126	66.1126	0.000	*
SBI: Upper Limit	59.8161	59.8161	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Billing Name and Address	87.5000	87.5000	0.000	*
Proposed SBI	88.1501	88.1501	0.000	*
SBI: Upper Limit	79.7548	79.7548	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Traffic Sensitive	60.2302	60.2302	-0.000	*
TS API	60.2763	60.2763	0.000	*
TS PCI				*
LEC API Above PCI?				*
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge	93.6047	93.6047	0.000	*
Proposed SBI	93.8139	93.8139	-0.000	*
SBI: Upper Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Tandem Switched Transport	94.0162	94.0162	0.000	*
Proposed SBI	95.6902	95.6902	-0.000	*
SBI: Upper Limit	89.1232	89.1232	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
VG, MT, TG	89.92	89.92	-0.000	*
Proposed SBI	90.10	90.10	-0.000	*
SBI: Upper Limit	81.52	81.52	-0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Audio & Video	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
HiCap				
DS1	82.82	82.82	0.000	*
Prop Sub-Index	91.06	91.06	0.000	*
Sub-Index Up Lim	82.36	82.36	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3	0.00	NONE	0.000	*
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
Total HiCap/DDS	84.50	84.50	0.000	*
Proposed SBI	90.13	90.13	0.000	*
SBI: Upper Limit	81.54	81.54	0.000	*
SBI: Lower Limit				*
LEC SBI Out?				*
FCC SBI Out?				
Wideband	0.00	NONE	0.000	*
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit				*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Trunking	86.08	86.08	-0.000	*
Trunking API	86.08	86.08	0.000	*
Trunking PCI				*
LEC API Above PCI?				*
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING----------				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING----------				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING----------				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02536			
X for CL, TS and SP	0.05300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$68			
IBW	$0			
RDA	$0			
EDT	$32			
ITC	$88			
REMOVAL SHARING/LOW END	$749			
REVISION SHARING/LOW END	$522			
SHARING/LOW END ADJ	($2,277)			
TELECOMM.RELAY SVCS.	$15			
OTHER	$0			
TOTAL OF INDIVIDUALS	($799)			
TOTAL EXOGENOUS	($799)			
COMMON LINE				
Term Prem CCL Rate	0.09894	0.04670	-0.01006	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.37241			
Proposed PCI	104.2287	104.2287	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	62.3186	62.3186	-0.000	*
SBI: Upper Limit	65.1066	65.1066	-0.000	*
SBI: Lower Limit	58.9080	58.9080	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	65.0915	65.0915	0.000	*
SBI: Upper Limit	68.9577	68.9577	-0.000	*
SBI: Lower Limit	60.5606	60.5606	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.8671	102.8671	-0.000	*
SBI: Lower Limit	93.0702	93.0702	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	99.0000	99.0000	0.000	*
SBI: Upper Limit	70.9783	70.9783	-0.000	*
SBI: Lower Limit	64.2185	64.2185	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.8671	102.8671	-0.000	*
SBI: Lower Limit	93.0702	93.0702	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	61.5344	61.5344	-0.000	*
TS PCI	61.5511	61.5511	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	97.1985	97.1985	-0.000	*
SBI: Upper Limit	97.1999	97.1999	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	98.9094	98.9094	-0.000	*
SBI: Upper Limit	99.1245	99.1245	0.000	*
SBI: Lower Limit	92.3219	92.3219	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	75.29	75.29	-0.000	*
SBI: Upper Limit	79.29	79.29	0.000	*
SBI: Lower Limit	71.74	71.74	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	78.18	78.18	0.000	*
SBI: Upper Limit	79.78	79.78	-0.000	*
SBI: Lower Limit	72.18	72.18	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	76.22	76.22	-0.000	*
Sub-Index Up Lim	78.15	78.15	0.000	*
Sub-Index Low Lim	70.70	70.70	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DS3				
Proposed SBI	76.35	76.35	-0.000	*
SBI: Upper Limit	78.20	78.20	0.000	*
SBI: Lower Limit	70.75	70.75	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	76.06	76.06	-0.000	*
Trunking PCI	76.09	76.09	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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TRUNKING	LEC	FCC	Delta	Flag
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($105)			
ISW	$0			
RDA	$0			
EDT	$107			
ITC	$72			
REMOVAL SHARING/LOW END	($520)			
REVISION SHARING/LOW END	($2,064)			
SHARING/LOW END ADJ	($2,658)			
TELECOMM.RELAY SVCS.	$33			
OTHER	$0			
TOTAL OF INDIVIDUALS	($5,157)			
TOTAL EXOGENOUS	($5,157)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.05256	−0.01592	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.09318			
Proposed PCI	115.9514	115.9514	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	67.1864	67.1864	−0.000	*
SBI: Upper Limit	70.5296	70.5296	−0.000	*
SBI: Lower Limit	63.8125	63.8125	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	68.3060	68.3060	−0.000	*
SBI: Upper Limit	68.9425	68.9425	−0.000	*
SBI: Lower Limit	62.3766	62.3766	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	96.0000	96.0002	−0.000	*
SBI: Upper Limit	97.0056	97.0056	0.000	*
SBI: Lower Limit	87.7666	87.7666	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	72.0000	72.0000	−0.000	*
SBI: Upper Limit	72.7542	72.7542	0.000	*
SBI: Lower Limit	65.8252	65.8252	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	95.2424	95.2406	0.002	*
SBI: Upper Limit	97.0056	97.0056	0.000	*
SBI: Lower Limit	87.7666	87.7666	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	66.3014	66.3014	−0.000	*
TS PCI	66.3338	66.3338	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	89.6848	89.6848	−0.000	*
SBI: Upper Limit	89.8910	89.8910	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	90.3750	90.3750	0.000	*
SBI: Upper Limit	91.6888	91.6888	−0.000	*
SBI: Lower Limit	85.3965	85.3965	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	95.49	95.49	−0.000	*
SBI: Upper Limit	96.04	96.04	−0.000	*
SBI: Lower Limit	86.89	86.89	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	83.92	83.92	−0.001	*
SBI: Upper Limit	84.25	84.25	0.000	*
SBI: Lower Limit	76.22	76.22	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	80.07	80.07	0.000	*
Sub−Index Up Lim	87.25	87.25	0.000	*
Sub−Index Low Lim	78.94	78.94	−0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	94.10	94.10	0.000	*
Sub−Index Up Lim	94.88	94.39	−0.002	*
Sub−Index Low Lim	85.39	85.40	−0.002	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	81.46	81.46	−0.000	*
SBI: Upper Limit	86.36	86.36	−0.000	*
SBI: Lower Limit	78.13	78.13	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	85.17	85.17	−0.000	*
SBI: Upper Limit	85.95	85.95	−0.000	*
SBI: Lower Limit	77.77	77.77	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	82.48	82.48	0.000	*
Trunking PCI	82.48	82.48	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$2			
ISW	$0			
RDA	$16			
EDT	$49			
ITC	$33			
REMOVAL SHARING/LOW END	($591)			
REVISION SHARING/LOW END	($474)			
SHARING/LOW END ADJ	($570)			
TELECOMM.RELAY SVCS.	$4			
OTHER	$0			
TOTAL OF INDIVIDUALS	($1,531)			
TOTAL EXOGENOUS	($1,531)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.04079	-0.00415	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.08228			
Proposed PCI	99.9965	99.9965	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	84.7000	84.7000	0.000	*
SBI: Upper Limit	88.4718	88.4718	-0.000	*
SBI: Lower Limit	80.0459	80.0459	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	86.7789	86.7789	-0.000	*
SBI: Upper Limit	87.4880	87.4880	0.000	*
SBI: Lower Limit	79.1558	79.1558	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	93.6842	93.6841	0.000	*
SBI: Upper Limit	94.2458	94.2458	0.000	*
SBI: Lower Limit	85.2700	85.2700	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	89.0000	89.0000	0.000	*
SBI: Upper Limit	89.5335	89.5335	-0.000	*
SBI: Lower Limit	81.0065	81.0065	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	92.8277	92.8277	0.000	*
SBI: Upper Limit	94.2458	94.2458	0.000	*
SBI: Lower Limit	85.2700	85.2700	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	84.2451	84.2451	-0.000	*
TS PCI	84.2502	84.2502	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	85.0054	85.0054	0.000	*
SBI: Upper Limit	85.0332	85.0332	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	86.6735	86.6735	0.000	*
SBI: Upper Limit	86.7339	86.7339	0.000	*
SBI: Lower Limit	80.7815	80.7815	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	85.92	85.92	0.000	*
SBI: Upper Limit	86.74	86.74	-0.000	*
SBI: Lower Limit	78.48	78.48	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	82.04	82.04	0.000	*
Sub-Index Up Lim	87.23	87.23	0.000	*
Sub-Index Low Lim	76.92	76.92	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	81.56	81.56	0.000	*
SBI: Upper Limit	85.44	85.44	0.000	*
SBI: Lower Limit	77.30	77.30	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	82.72	82.72	-0.000	*
Trunking PCI	82.72	82.72	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$17			
ISW	$0			
RDA	$0			
EDT	$1			
ITC	$14			
REMOVAL SHARING/LOW END	($70)			
REVISION SHARING/LOW END	($46)			
SHARING/LOW END ADJ	($1,480)			
TELECOMM.RELAY SVCS.	$6			
OTHER	$0			
TOTAL OF INDIVIDUALS	($1,558)			
TOTAL EXOGENOUS	($1,558)			
COMMON LINE				
Term Prem CCL Rate	0.03664	0.04541	-0.00877	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.08096			
Proposed PCI	107.5627	107.5627	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	70.0951	70.0951	0.000	*
SBI: Upper Limit	73.6405	73.6405	0.000	*
SBI: Lower Limit	66.6271	66.6271	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	71.3709	71.3709	-0.000	*
SBI: Upper Limit	72.3752	72.3752	0.000	*
SBI: Lower Limit	65.4823	65.4823	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	98.7013	98.7014	-0.000	*
SBI: Upper Limit	98.9446	98.9446	0.000	*
SBI: Lower Limit	89.5213	89.5213	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	76.0000	76.0000	-0.000	*
SBI: Upper Limit	76.1873	76.1873	-0.000	*
SBI: Lower Limit	68.9314	68.9314	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	97.3770	97.3770	-0.000	*
SBI: Upper Limit	98.9446	98.9446	0.000	*
SBI: Lower Limit	89.5213	89.5213	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	89.1449	89.1449	0.000	*
TS PCI	89.1617	89.1617	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	77.3512	77.3512	0.000	*
SBI: Upper Limit	77.4555	77.4555	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	75.6541	75.6541	0.000	*
SBI: Upper Limit	79.0046	79.0046	-0.000	*
SBI: Lower Limit	73.5827	73.5827	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	62.96	62.96	0.000	*
SBI: Upper Limit	63.66	63.66	-0.000	*
SBI: Lower Limit	57.60	57.60	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	81.20	81.20	-0.000	*
SBI: Upper Limit	81.33	81.33	-0.000	*
SBI: Lower Limit	73.56	73.56	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	58.07	58.07	-0.000	*
Sub-Index Up Lim	63.80	63.80	0.000	*
Sub-Index Low Lim	57.73	57.73	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	60.67	60.67	0.000	*
SBI: Upper Limit	63.67	63.67	0.000	*
SBI: Lower Limit	57.79	57.79	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	60.75	60.75	0.000	*
Trunking PCI	60.76	60.76	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

ANALYZER

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
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Filing Entity: COWA
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1994 Annual Filing (Filename: COWA4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: COWA
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($5)			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$20			
REMOVAL SHARING/LOW END	$63			
REVISION SHARING/LOW END	$10			
SHARING/LOW END ADJ	($298)			
TELECOMM.RELAY SVCS.	($535)			
OTHER	$2			
TOTAL OF INDIVIDUALS	$0			
TOTAL EXOGENOUS	($823)			
COMMON LINE	($823)			
Term Prem CCL Rate	0.09664	0.03808	-0.00144	LOW
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.28397			
Proposed PCI	93.5362	93.5362	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	89.1661	89.1661	-0.000	*
SBI: Upper Limit	92.3967	92.3967	-0.000	*
SBI: Lower Limit	83.5870	83.5870	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	91.9033	91.9033	0.000	*
SBI: Upper Limit	92.1113	92.1113	0.000	*
SBI: Lower Limit	83.3388	83.3388	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.2263	100.2263	0.000	*
SBI: Lower Limit	90.6809	90.6809	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	94.0000	94.0000	0.000	*
SBI: Upper Limit	94.2127	94.2127	-0.000	*
SBI: Lower Limit	85.2401	85.2401	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	100.2263	100.2263	0.000	*
SBI: Lower Limit	90.6809	90.6809	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	89.2727	89.2727	0.000	*
TS PCI	89.2648	89.2648	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

	LEC		FCC	Delta	Flag
INTEREXCHANGE					
Interexchange API	0.00	NONE		0.000	*
Interexchange PCI	0.00	NONE		0.000	*
LEC API Above PCI?					*
FCC API Above PCI?					*

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Filing Entity: COWZ
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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	92.8315	92.8315	0.000	*
SBI: Upper Limit	92.8600	92.8600	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	93.6648	93.6648	-0.000	*
SBI: Upper Limit	94.7172	94.7172	0.000	*
SBI: Lower Limit	88.2170	88.2170	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	89.65	89.65	-0.000	*
SBI: Upper Limit	90.47	90.47	0.000	*
SBI: Lower Limit	81.85	81.85	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	97.27	97.27	-0.000	*
SBI: Upper Limit	97.50	97.50	0.000	*
SBI: Lower Limit	88.22	88.22	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	87.03	87.03	-0.000	*
Sub-Index Up Lim	88.96	88.96	0.000	*
Sub-Index Low Lim	80.49	80.49	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	86.96	86.96	-0.000	*
SBI: Upper Limit	88.34	88.34	-0.000	*
SBI: Lower Limit	79.93	79.93	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	86.45	86.45	0.000	*
Trunking PCI	86.45	86.45	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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Filing Entity: COWZ
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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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Filing Entity: COWZ
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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/29/94
Filing Entity: COWZ
Transmittal Number: 89
1994 Annual Filing (Filename: COWZ4294)
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

United & Centel

ANALYZER
Filing Date: 4/22/94
Filing Entity: CEEL – Centel of Florida
Transmittal Number: 6
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($45)			
ISW	$0			
RDA	$0			
EDT	($0)			
ITC	$82			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($422)			
TELECOMM.RELAY SVCS.	$46			
OTHER	$0			
TOTAL OF INDIVIDUALS	($339)			
TOTAL EXOGENOUS	($366)			
COMMON LINE				
Term Prem CCL Rate	0.01140	0.01140	−0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	−0.00139			
Proposed PCI	100.6775	100.6775	0.0000	*

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Filing Date: 4/22/94
Filing Entity: CEFL – Centel of Florida
Transmittal Number: 6
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	87.6324	87.6324	0.000	*
SBI: Upper Limit	91.6439	91.6439	−0.000	*
SBI: Lower Limit	82.9159	82.9159	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	82.7456	82.7456	−0.000	*
SBI: Upper Limit	91.2974	91.2974	−0.000	*
SBI: Lower Limit	82.6024	82.6024	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.6116	102.6116	0.000	*
SBI: Lower Limit	92.8360	92.8360	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	97.1196	97.1196	−0.000	*
SBI: Upper Limit	96.2843	96.2843	−0.000	*
SBI: Lower Limit	97.1144	97.1144	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.6116	102.6116	0.000	*
SBI: Lower Limit	92.8360	92.8360	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	97.3314	97.3314	0.000	*
TS PCI	97.3346	97.3346	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	100.00	NONE	100.000	HIGH
LEC API Above PCI?				LOW
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	97.7445	97.7445	0.000	*
SBI: Upper Limit	97.7520	97.7520	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	92.8735	92.8735	0.000	*
SBI: Upper Limit	99.7071	99.7071	0.000	*
SBI: Lower Limit	92.8644	92.8644	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	95.40	95.40	0.000	*
SBI: Upper Limit	97.90	97.90	−0.000	*
SBI: Lower Limit	88.58	88.58	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	90.02	90.02	0.000	*
SBI: Upper Limit	92.39	92.39	−0.000	*
SBI: Lower Limit	83.59	83.59	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	54.49	54.49	−0.000	*
Sub−Index Up Lim	57.94	57.94	−0.000	*
Sub−Index Low Lim	52.43	52.43	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	62.99	62.99	0.000	*
Sub−Index Up Lim	67.63	67.63	0.000	*
Sub−Index Low Lim	61.19	61.19	−0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DOS				
Proposed SBI	60.26	60.26	−0.000	*
SBI: Upper Limit	63.73	63.73	−0.000	*
SBI: Lower Limit	57.66	57.66	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	80.79	80.79	0.000	*
Trunking PCI	88.51	88.51	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02936			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($32)			
ISW	$0			
RDA	$0			
EDT	$27			
ITC	$19			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$21			
TELECOMM.RELAY SVCS.	$31			
OTHER	$0			
TOTAL OF INDIVIDUALS	$66			
TOTAL EXOGENOUS	$66			
COMMON LINE				
Term Prem CCL Rate	0.01106	0.01106	−0.00000	•
Orig Prem CCL Rate	0.01000	0.01000	0.00000	•
g	0.00632			
Proposed PCI	108.9664	108.9664	0.0000	•

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	86.7038	86.7038	0.000	•
SBI: Upper Limit	91.3626	91.3626	0.000	•
SBI: Lower Limit	82.6615	82.6615	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	83.7444	83.7444	−0.000	•
SBI: Upper Limit	92.4772	92.4772	0.000	•
SBI: Lower Limit	83.6006	83.6006	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	103.6842	103.6842	0.000	•
SBI: Lower Limit	93.8065	93.8065	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	87.0934	87.0934	0.000	•
SBI: Upper Limit	96.1907	96.1907	0.000	•
SBI: Lower Limit	87.0297	87.0297	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	102.5000	102.5000	−0.000	•
SBI: Upper Limit	103.6842	103.6842	0.000	•
SBI: Lower Limit	93.8065	93.8065	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	86.8380	86.8380	−0.000	•
TS PCI	87.2481	87.2481	−0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	•
Interexchange PCI	100.00	NONE	100.000	HIGH
LEC API Above PCI?				LOW
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	86.2626	86.2626	0.000	•
SBI: Upper Limit	86.7662	86.7662	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Tandem Switched Transport				
Proposed SBI	93.9125	93.9125	−0.000	•
SBI: Upper Limit	100.7415	100.7415	−0.000	•
SBI: Lower Limit	93.8279	93.8279	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
VG, MT, TG				
Proposed SBI	93.72	93.72	−0.000	•
SBI: Upper Limit	97.14	97.14	−0.000	•
SBI: Lower Limit	87.86	87.86	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Audio & Video				
Proposed SBI	100.00	100.00	0.000	•
SBI: Upper Limit	103.70	103.70	−0.000	•
SBI: Lower Limit	93.83	93.83	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
HiCap				
DS1				
Prop Sub−Index	80.01	80.01	−0.000	•
Sub−Index Up Lim	87.90	87.90	−0.000	•
Sub−Index Low Lim	79.53	79.53	−0.000	•
LEC Sub−Ind Out?				•
FCC Sub−Ind Out?				•
DS3				
Prop Sub−Index	83.90	83.90	−0.000	•
Sub−Index Up Lim	87.94	87.94	−0.000	•
Sub−Index Low Lim	79.56	79.56	−0.000	•
LEC Sub−Ind Out?				•
FCC Sub−Ind Out?				•
Total HiCap/DDS				
Proposed SBI	81.27	81.27	0.000	•
SBI: Upper Limit	89.73	89.73	0.000	•
SBI: Lower Limit	81.18	81.18	0.000	•
LEC SBI Out?				•
FCC SBI Out?				•
Wideband				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Trunking				
Trunking API	85.59	85.59	−0.000	•
Trunking PCI	88.11	88.11	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	78.85	78.85	-0.000	*
Sub-I	87.90	87.90	-0.000	*
Sub-I	75.35	75.35	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	87.32	87.32	-0.000	*
Sub-I	87.90	87.90	-0.000	*
Sub-I	75.35	75.35	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	82.46	82.46	0.000	*
Sub-I	87.94	87.94	-0.000	*
Sub-I	75.36	75.36	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	86.66	86.66	0.000	*
Sub-I	87.94	87.94	-0.000	*
Sub-I	75.36	75.36	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES In thous				
SPF	$0			
DEM	$0			
LTS/TRB	($36)			
ISW	$0			
RDA	$0			
EDT	($17)			
ITC	$54			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$0			
TELECOMM.RELAY SVCS.	$23			
OTHER	$0			
TOTAL OF INDIVIDUALS	$3			
TOTAL EXOGENOUS	$3			
COMMON LINE				
Term Prem CCL Rate	0.02301	0.02301	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02111			
Proposed PCI	100.4046	100.4046	−0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	86.0950	86.0950	−0.000	*
SBI: Upper Limit	90.0097	90.0097	−0.000	*
SBI: Lower Limit	81.4374	81.4374	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	81.3701	81.3701	−0.000	*
SBI: Upper Limit	89.9354	89.9354	−0.000	*
SBI: Lower Limit	81.3701	81.3701	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	104.5810	104.5810	−0.000	*
SBI: Upper Limit	104.5810	104.5810	−0.000	*
SBI: Lower Limit	94.6209	94.6209	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	82.8057	82.8057	−0.000	*
SBI: Upper Limit	91.5210	91.5210	−0.000	*
SBI: Lower Limit	82.8047	82.8047	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	104.5810	104.5810	0.000	*
SBI: Upper Limit	104.5810	104.5810	−0.000	*
SBI: Lower Limit	94.6209	94.6209	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	85.8396	85.8396	−0.000	*
TS PCI	85.8396	85.8396	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	100.00	NONE	100.000	HIGH
LEC API Above PCI?				LOW
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	99.5996	99.5996	0.000	*
SBI: Upper Limit	99.5996	99.5996	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Tandem Switched Transport				
Proposed SBI	101.5916	101.5916	0.000	*
SBI: Upper Limit	101.5916	101.5916	0.000	*
SBI: Lower Limit	94.6196	94.6196	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	87.99	87.99	0.000	*
SBI: Upper Limit	88.03	88.03	0.000	*
SBI: Lower Limit	79.65	79.65	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
HiCap				
DS1				
Prop Sub-Index	79.86	79.86	0.000	*
Sub-Index Up Lim	88.27	88.27	0.000	*
Sub-Index Low Lim	79.86	79.86	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3				
Prop Sub-Index	104.56	104.56	−0.000	*
Sub-Index Up Lim	104.58	104.58	−0.000	*
Sub-Index Low Lim	94.62	94.62	−0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	79.91	79.91	0.000	*
SBI: Upper Limit	88.24	88.24	0.000	*
SBI: Lower Limit	79.83	79.83	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Trunking				
Trunking API	82.77	82.77	0.000	*
Trunking PCI	83.97	83.97	−0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	($68)			
ISW	$0			
RDA	$0			
EDT	($14)			
ITC	$132			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($486)			
TELECOMM.RELAY SVCS.	$60			
OTHER	$0			
TOTAL OF INDIVIDUALS	($357)			
TOTAL EXOGENOUS	($357)			
COMMON LINE				
Term Prem CCL Rate	0.00153	0.00153	-0.00000	*
Orig Prem CCL Rate	0.00153	0.00153	-0.00000	*
g	0.02350			
Proposed PCI	91.8636	91.8636	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	85.4028	85.4028	-0.000	*
SBI: Upper Limit	89.5805	89.5805	0.000	*
SBI: Lower Limit	81.0490	81.0490	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	80.3111	80.3111	-0.000	*
SBI: Upper Limit	88.6257	88.6257	-0.000	*
SBI: Lower Limit	80.1852	80.1852	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.7939	102.7939	0.000	*
SBI: Lower Limit	93.0040	93.0040	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	85.9313	85.9313	-0.000	*
SBI: Upper Limit	93.9696	93.9696	0.000	*
SBI: Lower Limit	85.0202	85.0202	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.7939	102.7939	0.000	*
SBI: Lower Limit	93.0040	93.0040	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	85.1015	85.1015	0.000	*
TS PCI	85.2360	85.2360	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	100.00	NONE	100.000	HIGH
LEC API Above PCI?				LOW
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	97.8613	97.8613	-0.000	*
SBI: Upper Limit	97.8613	97.8613	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	99.7991	99.7991	0.000	*
SBI: Upper Limit	99.8185	99.8185	-0.000	*
SBI: Lower Limit	92.9682	92.9682	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	97.79	97.79	-0.000	*
SBI: Upper Limit	98.03	98.03	0.000	*
SBI: Lower Limit	88.69	88.69	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	88.61	88.61	-0.000	*
SBI: Upper Limit	96.29	96.29	-0.000	*
SBI: Lower Limit	87.12	87.12	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	93.60	93.60	-0.000	*
Sub-Index Up Lim	92.24	92.24	-0.000	*
Sub-Index Low Lim	93.46	93.46	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	93.36	93.36	0.000	*
Sub-Index Up Lim	93.50	93.50	0.000	*
Sub-Index Low Lim	84.68	84.68	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	87.35	87.35	-0.000	*
SBI: Upper Limit	92.05	92.05	-0.000	*
SBI: Lower Limit	83.28	83.28	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	90.82	90.82	0.000	*
Trunking PCI	91.90	91.90	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-i	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$429			
ISW	$0			
RDA	$0			
EDT	($58)			
ITC	$61			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($829)			
TELECOMM.RELAY SVCS.	$21			
OTHER	$0			
TOTAL OF INDIVIDUALS	($176)			
TOTAL EXOGENOUS	($176)			
COMMON LINE				
Term Prem CCL Rate	0.02042	0.02042	−0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02819			
Proposed PCI	103.3253	103.3253	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	79.7388	79.7388	−0.000	*
SBI: Upper Limit	83.4488	83.4488	0.000	*
SBI: Lower Limit	75.5013	75.5013	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	74.7828	74.7828	0.000	*
SBI: Upper Limit	82.6206	82.6206	0.000	*
SBI: Lower Limit	74.7519	74.7519	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	89.9270	89.9270	−0.000	*
SBI: Upper Limit	99.3870	99.3870	−0.000	*
SBI: Lower Limit	89.9216	89.9216	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Acces				
Proposed SBI	79.2196	79.2196	0.000	*
SBI: Upper Limit	87.5585	87.5585	−0.000	*
SBI: Lower Limit	79.2196	79.2196	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	99.3750	99.3750	0.000	*
SBI: Upper Limit	99.3870	99.3870	−0.000	*
SBI: Lower Limit	89.9216	89.9216	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	79.4225	79.4225	−0.000	*
TS PCI	79.4228	79.4228	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	100.00	NONE	100.000	HIGH
LEC API Above PCI?				LOW
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	94.5162	94.5162	−0.000	*
SBI: Upper Limit	94.5199	94.5199	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	89.9827	89.9827	−0.000	*
SBI: Upper Limit	96.4103	96.4103	−0.000	*
SBI: Lower Limit	89.7939	89.7939	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	84.22	84.22	−0.000	*
SBI: Upper Limit	84.34	84.34	−0.000	*
SBI: Lower Limit	76.31	76.31	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	83.53	83.53	0.000	*
SBI: Upper Limit	83.62	83.62	−0.000	*
SBI: Lower Limit	75.65	75.65	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub–Index	72.72	72.72	−0.000	*
Sub–Index Up Lim	79.93	79.93	0.000	*
Sub–Index Low Lim	72.31	72.31	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3				
Prop Sub–Index	92.88	92.88	−0.000	*
Sub–Index Up Lim	99.25	99.25	0.000	*
Sub–Index Low Lim	89.79	89.79	−0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
Total HiCap/DDS				
Proposed SBI	75.10	75.10	−0.000	*
SBI: Upper Limit	81.73	81.73	−0.000	*
SBI: Lower Limit	73.95	73.95	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	78.45	78.45	0.000	*
Trunking PCI	80.12	80.12	−0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$382			
ISW	$0			
RDA	$0			
EDT	($103)			
ITC	$169			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($857)			
TELECOMM.RELAY SVCS.	$35			
OTHER	$0			
TOTAL OF INDIVIDUALS	($374)			
TOTAL EXOGENOUS	($374)			
COMMON LINE				
Term Prem CCL Rate	0.02935	0.02935	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02980			
Proposed PCI	101.4084	101.4084	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	83.6560	83.6560	−0.000	*
SBI: Upper Limit	87.5950	87.5950	−0.000	*
SBI: Lower Limit	79.2526	79.2526	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	79.1770	79.1770	0.000	*
SBI: Upper Limit	87.5114	87.5114	0.000	*
SBI: Lower Limit	79.1770	79.1770	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	102.0983	102.0983	−0.000	*
SBI: Upper Limit	102.0983	102.0983	0.000	*
SBI: Lower Limit	92.3755	92.3755	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	83.4751	83.4751	−0.000	*
SBI: Upper Limit	92.2616	92.2616	−0.000	*
SBI: Lower Limit	83.4748	83.4748	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	102.0983	102.0983	0.000	*
SBI: Upper Limit	102.0983	102.0983	0.000	*
SBI: Lower Limit	92.3755	92.3755	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	83.6550	83.6550	−0.000	*
TS PCI	83.6550	83.6550	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	100.00	NONE	100.000	HIGH
LEC API Above PCI?				LOW
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	97.2523	97.2523	0.000	*
SBI: Upper Limit	97.2523	97.2523	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	94.2435	94.2435	−0.000	*
SBI: Upper Limit	99.1973	99.1973	−0.000	*
SBI: Lower Limit	92.3897	92.3897	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	82.12	82.12	0.000	*
SBI: Upper Limit	86.71	86.71	0.000	*
SBI: Lower Limit	78.45	78.45	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub–Index	78.21	78.21	−0.000	*
Sub–Index Up Lim	86.43	86.43	−0.000	*
Sub–Index Low Lim	78.20	78.20	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3				
Prop Sub–Index	92.40	92.40	0.000	*
Sub–Index Up Lim	102.11	102.11	−0.000	*
Sub–Index Low Lim	92.39	92.39	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
Total HiCap/DDS				
Proposed SBI	78.27	78.27	−0.000	*
SBI: Upper Limit	86.46	86.46	−0.000	*
SBI: Lower Limit	78.23	78.23	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	80.29	80.29	−0.000	*
Trunking PCI	82.45	82.45	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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GENERAL	LEC	FCC	Delta	Flag
GNPPI				
X for CL, TS and Trk	0.02636			
X for IX	0.04300			
	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$107			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$49			
REMOVAL SHARING/LOW END	$229			
REVISION SHARING/LOW END	$63			
SHARING/LOW END ADJ	$7			
TELECOMM.RELAY SVCS.	($1,365)			
OTHER	$63			
TOTAL OF INDIVIDUALS	$0			
TOTAL EXOGENOUS	($847)			
	($847)			
COMMON LINE				
Term Prem CCL Rate	0.01356	0.01356	-0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.03188			
Proposed PCI	96.5774	96.5774	0.0000	*

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TRAFFIC SENSITIVE	LEC	FCC	Delta	Flag
Local Switching				
Proposed SBI				
SBI: Upper Limit	84.8683	84.8683	0.000	*
SBI: Lower Limit	88.9168	88.9168	0.000	*
LEC SBI Out Bounds?	90.4485	90.4485	0.000	*
FCC SBI Out Bounds?				*
Information				*
Proposed SBI				
SBI: Upper Limit	78.7530	78.7530	0.000	*
SBI: Lower Limit	86.9620	86.9620	0.000	*
LEC SBI Out Bounds?	78.6799	78.6799	0.000	*
FCC SBI Out Bounds?				*
Database Access				*
Vert.Services: SBI				
SBI: Upper Limit	100.0000	100.0000	0.000	*
SBI: Lower Limit	101.5180	101.5180	-0.000	*
LEC SBI Out Bounds?	91.8498	91.8498	-0.000	*
FCC SBI Out Bounds?				*
Total Database Access				*
Proposed SBI				
SBI: Upper Limit	83.1130	83.1130	0.000	*
SBI: Lower Limit	84.3746	84.3746	0.000	*
LEC SBI Out Bounds?	76.3390	76.3390	0.000	*
FCC SBI Out Bounds?				*
Billing Name and Address				*
Proposed SBI				
SBI: Upper Limit	101.2500	101.2500	0.000	*
SBI: Lower Limit	101.5180	101.5180	-0.000	*
LEC SBI Out Bounds?	91.8498	91.8498	-0.000	*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				*
TS API				
TS PCI	90.1664	90.1664	0.000	*
LEC API Above PCI?	90.1662	90.1662	0.000	*
FCC API Above PCI?				*
				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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TRUNKING	LEC	FCC	Delta	Flag
Interconnection Charge				
Proposed SBI				
SBI: Upper Limit	96.7416	96.7416	0.000	*
LEC SBI Out Bounds?	96.7458	96.7458	-0.000	*
FCC SBI Out Bounds?				*
Tandem Switched Transport				*
Proposed SBI				
SBI: Upper Limit	91.9259	91.9259	-0.000	*
SBI: Lower Limit	96.6807	96.6807	0.000	*
LEC SBI Out Bounds?	91.9085	91.9085	0.000	*
FCC SBI Out Bounds?				*
VG, MT, TG				*
Proposed SBI				
SBI: Upper Limit	89.43	89.43	0.000	*
SBI: Lower Limit	90.81	90.81	-0.000	*
LEC SBI Out Bounds?	82.16	82.16	-0.000	*
FCC SBI Out Bounds?				*
Audio & Video				*
Proposed SBI				
SBI: Upper Limit	81.87	81.87	0.000	*
SBI: Lower Limit	89.29	89.29	-0.000	*
LEC SBI Out Bounds?	80.79	80.79	-0.000	*
FCC SBI Out Bounds?				*
HiCap				*
DS1				
Prop Sub-Index				
Sub-Index Up Lim	83.22	83.22	0.000	*
Sub-Index Low Lim	90.96	90.96	0.000	*
LEC Sub-Ind Out?	82.30	82.30	0.000	*
FCC Sub-Ind Out?				*
DS3				*
Prop Sub-Index				
Sub-Index Up Lim	76.72	76.72	0.000	*
Sub-Index Low Lim	83.44	83.44	0.000	*
LEC Sub-Ind Out?	75.50	75.50	0.000	*
FCC Sub-Ind Out?				*
Total HiCap/DDS				*
Proposed SBI				
SBI: Upper Limit	81.66	81.66	-0.000	*
SBI: Lower Limit	90.02	90.02	0.000	*
LEC SBI Out?	81.44	81.44	-0.000	*
FCC SBI Out?				*
Wideband				*
Proposed SBI				
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?	0.00	NONE	0.000	*
FCC SBI Out Bounds?				*
Total Trunking				*
Trunking API				
Trunking PCI	83.72	83.72	-0.000	*
LEC API Above PCI?	85.26	85.26	0.000	*
FCC API Above PCI?				LO
				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$304			
ISW	$0			
RDA	$0			
EDT	($4)			
ITC	$107			
REMOVAL SHARING/LOW END	($1,106)			
REVISION SHARING/LOW END	($49)			
SHARING/LOW END ADJ	($5,666)			
TELECOMM.RELAY SVCS.	$195			
OTHER	$0			
TOTAL OF INDIVIDUALS	($6,223)			
TOTAL EXOGENOUS	($6,223)			
COMMON LINE				
Term Prem CCL Rate	0.01970	0.01970	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	-0.91009			
Proposed PCI	90.5957	90.5957	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	80.0947	80.0947	0.000	*
SBI: Upper Limit	83.9764	83.9764	0.000	*
SBI: Lower Limit	75.9787	75.9787	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	89.6846	89.6846	0.000	*
SBI: Upper Limit	77.0140	77.0140	0.000	*
SBI: Lower Limit	89.6793	89.6793	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	89.6260	89.6260	-0.000	*
SBI: Upper Limit	89.6962	89.6962	0.000	*
SBI: Lower Limit	90.2014	90.2014	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	78.6961	78.6961	-0.000	*
SBI: Upper Limit	78.7023	78.7023	0.000	*
SBI: Lower Limit	71.2069	71.2069	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	89.6250	89.6250	0.000	*
SBI: Upper Limit	89.6962	89.6962	0.000	*
SBI: Lower Limit	90.2014	90.2014	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	74.0672	74.0672	-0.000	*
TS PCI	74.0674	74.0674	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	94.9242	94.9242	0.000	*
SBI: Upper Limit	94.9382	94.9382	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	90.8883	90.8883	0.000	*
SBI: Upper Limit	90.8369	90.8369	-0.000	*
SBI: Lower Limit	90.1913	90.1913	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	92.91	92.91	0.000	*
SBI: Upper Limit	93.11	93.11	-0.000	*
SBI: Lower Limit	84.25	84.25	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	88.58	88.58	-0.000	*
SBI: Upper Limit	88.60	88.60	0.000	*
SBI: Lower Limit	80.16	80.16	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	66.65	66.65	-0.000	*
Sub-Index Up Lim	67.44	67.44	0.000	*
Sub-Index Low Lim	61.02	61.02	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	74.08	74.08	-0.000	*
Sub-Index Up Lim	74.14	74.14	0.000	*
Sub-Index Low Lim	67.08	67.08	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	72.49	72.49	0.000	*
SBI: Upper Limit	72.93	72.93	0.000	*
SBI: Lower Limit	65.99	65.99	0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	82.28	82.28	0.000	*
Trunking PCI	84.70	84.70	-0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
TandemSwitchedTransport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
TandemSwitchedTransport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
TandemSwitchedTransport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES In thous				
SPF	$0			
DEM	$0			
LTS/TRS	$53			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$85			
REMOVAL SHARING/LOW END	$895			
REVISION SHARING/LOW END	$79			
SHARING/LOW END ADJ	($1,247)			
TELECOMM.RELAY SVCS.	$31			
OTHER	$0			
TOTAL OF INDIVIDUALS	($104)			
TOTAL EXOGENOUS	($104)			
COMMON LINE				
Term Prem CCL Rate	0.02667	0.02667	-0.00000	•
Orig Prem CCL Rate	0.01000	0.01000	0.00000	•
g	0.04973			
Proposed PCI	96.0431	96.0431	0.0000	•

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	81.1279	81.1279	-0.000	•
SBI: Upper Limit	85.0402	85.0402	0.000	•
SBI: Lower Limit	76.9411	76.9411	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	70.7372	70.7372	-0.000	•
SBI: Upper Limit	78.0696	78.0696	0.000	•
SBI: Lower Limit	70.6344	70.6344	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	•
SBI: Upper Limit	102.3242	102.3242	-0.000	•
SBI: Lower Limit	92.5791	92.5791	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	81.2327	81.2327	0.000	•
SBI: Upper Limit	83.1207	83.1207	0.000	•
SBI: Lower Limit	75.2044	75.2044	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	101.2500	101.2500	0.000	•
SBI: Upper Limit	102.3242	102.3242	-0.000	•
SBI: Lower Limit	92.5791	92.5791	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	78.1237	78.1237	-0.000	•
TS PCI	78.1246	78.1246	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	•
Interexchange PCI	0.00	NONE	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag	
TRUNKING					
Interconnection Charge					
Proposed SBI	97.7329	97.7329	0.000	•	
SBI: Upper Limit	97.7526	97.7526	0.000	•	
LEC SBI Out Bounds?				•	
FCC SBI Out Bounds?					
Tandem Switched Transport					
Proposed SBI	93.3839	93.3839	0.000	•	
SBI: Upper Limit	99.7076	99.7076	0.000	•	
SBI: Lower Limit	92.8649	92.8649	-0.000	•	
LEC SBI Out Bounds?				•	
FCC SBI Out Bounds?				•	
VG, MT, TG					
Proposed SBI	96.48	96.48	-0.000	•	
SBI: Upper Limit	96.74	96.74	-0.000	•	
SBI: Lower Limit	87.53	87.53	-0.000	•	
LEC SBI Out Bounds?				•	
FCC SBI Out Bounds?					
Audio & Video					
Proposed SBI	87.82	87.82	0.000	•	
SBI: Upper Limit	90.14	90.14	-0.000	•	
SBI: Lower Limit	81.56	81.56	-0.000	•	
LEC SBI Out Bounds?				•	
FCC SBI Out Bounds?					
HiCap					
DS1					
Prop Sub-Index	83.58	83.58	-0.000	•	
Sub-Index Up Lim	92.38	92.38	-0.000	•	
Sub-Index Low Lim	83.58	83.58	-0.000	•	
LEC Sub-Ind Out?				•	
FCC Sub-Ind Out?					
DS3					
Prop Sub-Index	77.92	77.92	-0.000	•	
Sub-Index Up Lim	85.63	85.63	0.000	•	
Sub-Index Low Lim	77.47	77.47	-0.000	•	
LEC Sub-Ind Out?				•	
FCC Sub-Ind Out?					
Total HiCap/DDS					
Proposed SBI	84.40	84.40	-0.000	•	
SBI: Upper Limit	92.47	92.47	0.000	•	
SBI: Lower Limit	83.66	83.66	0.000	•	
LEC SBI Out?				•	
FCC SBI Out?					
Wideband					
Proposed SBI	0.00	NONE	0.000	•	
SBI: Upper Limit	0.00	NONE	0.000	•	
SBI: Lower Limit	0.00	NONE	0.000	•	
LEC SBI Out Bounds?				•	
FCC SBI Out Bounds?					
Total Trunking					
Trunking API	88.54	88.54	0.000	•	
Trunking PCI	90.33	90.33	0.000	•	LO
LEC API Above PCI?					LO
FCC API Above PCI?					

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$144			
ISW	$0			
RDA	$0			
EDT	$305			
ITC	$308			
REMOVAL SHARING/LOW END	$3,616			
REVISION SHARING/LOW END	($468)			
SHARING/LOW END ADJ	($1,845)			
TELECOMM.RELAY SVCS.	$108			
OTHER	$0			
TOTAL OF INDIVIDUALS	$2,368			
TOTAL EXOGENOUS	$2,368			
COMMON LINE				
Term Prem CCL Rate	0.04514	0.04514	−0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.02721			
Proposed PCI	116.7372	116.7372	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	84.4170	84.4170	−0.000	*
SBI: Upper Limit	88.5220	88.5220	−0.000	*
SBI: Lower Limit	80.0913	80.0913	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	78.0539	78.0539	−0.000	*
SBI: Upper Limit	86.2689	86.2689	−0.000	*
SBI: Lower Limit	78.0526	78.0526	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	104.6429	104.6429	−0.000	*
SBI: Upper Limit	104.6481	104.6481	0.000	*
SBI: Lower Limit	94.6816	94.6816	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	81.9636	81.9636	−0.000	*
SBI: Upper Limit	81.9644	81.9644	0.000	*
SBI: Lower Limit	74.1582	74.1582	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	104.6250	104.6250	0.000	*
SBI: Upper Limit	104.6481	104.6481	0.000	*
SBI: Lower Limit	94.6816	94.6816	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	79.2151	79.2151	−0.000	*
TS PCI	79.2151	79.2151	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	100.1559	100.1559	−0.000	*
SBI: Upper Limit	100.1565	100.1565	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	98.1161	98.1161	0.000	*
SBI: Upper Limit	102.1586	102.1586	0.000	*
SBI: Lower Limit	95.1486	95.1486	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	87.51	87.51	0.000	*
SBI: Upper Limit	87.51	87.51	−0.000	*
SBI: Lower Limit	79.16	79.16	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	91.72	91.72	0.000	*
SBI: Upper Limit	91.78	91.78	−0.000	*
SBI: Lower Limit	83.04	83.04	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	89.45	89.45	−0.000	*
Sub-Index Up Lim	95.57	95.57	−0.000	*
Sub-Index Low Lim	88.47	88.47	−0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	80.39	80.39	−0.000	*
Sub-Index Up Lim	84.10	84.10	−0.000	*
Sub-Index Low Lim	76.00	76.00	−0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	90.39	90.39	0.000	*
SBI: Upper Limit	96.16	96.16	0.000	*
SBI: Lower Limit	87.00	87.00	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	88.82	88.82	−0.000	*
Trunking PCI	87.23	87.23	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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GENERAL	LEC	FCC	Delta	Flag
GNPPI	0.02936			
X for CL, TS and Trk	0.06300			
X for IX	0.09000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$357			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	($290)			
REMOVAL SHARING/LOW END	$236			
REVISION SHARING/LOW END	($1,236)			
SHARING/LOW END ADJ	($785)			
TELECOMM.RELAY SVCS.	$0			
OTHER	$120			
TOTAL OP INDIVIDUALS	$0			
TOTAL EXOGENOUS	($1,712)			
	($1,712)			
COMMON LINE				
Term Prem CCL Rate	0.01632	0.01632	0.00000	•
Orig Prem CCL Rate	0.01000	0.01000	0.00000	•
g	0.02763			
Proposed PCI	104.3724	104.3724	0.0000	•

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TRAFFIC SENSITIVE	LEC	FCC	Delta	Flag
Local Switching				
Proposed SBI	94.9486	94.9486	−0.000	•
SBI: Upper Limit	96.6161	96.6161	0.000	•
SBI: Lower Limit	90.1288	90.1288	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	87.5419	87.5419	−0.000	•
SBI: Upper Limit	96.7289	96.7289	−0.000	•
SBI: Lower Limit	87.5166	87.5166	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	102.7902	102.7902	−0.000	•
SBI: Upper Limit	102.7974	102.7974	0.000	•
SBI: Lower Limit	93.0072	93.0072	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	92.8768	92.8768	0.000	•
SBI: Upper Limit	92.8772	92.8772	0.000	•
SBI: Lower Limit	84.0318	84.0318	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	102.7500	102.7500	0.000	•
SBI: Upper Limit	102.7974	102.7974	0.000	•
SBI: Lower Limit	93.0072	93.0072	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	87.9013	87.9013	−0.000	•
TS PCI	87.9017	87.9017	−0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

INTEREXCHANGE	LEC	FCC	Delta	Flag
Interexchange API	0.00	NONE	0.000	•
Interexchange PCI	0.00	NONE	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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TRUNKING	LEC	FCC	Delta	Flag
Interconnection Charge				
Proposed SBI	97.8105	97.8105	0.000	•
SBI: Upper Limit	97.8107	97.8107	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Tandem Switched Transport				
Proposed SBI	99.0095	99.0095	0.000	•
SBI: Upper Limit	99.7699	99.7699	−0.000	•
SBI: Lower Limit	92.9202	92.9202	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
VG, MT, TG				
Proposed SBI	87.66	87.66	−0.000	•
SBI: Upper Limit	88.34	88.34	0.000	•
SBI: Lower Limit	79.92	79.92	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Audio & Video				
Proposed SBI	91.14	91.14	0.000	•
SBI: Upper Limit	93.60	93.60	−0.000	•
SBI: Lower Limit	84.68	84.68	−0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
HiCap				
DS1				
Prop Sub-Index	92.48	92.48	0.000	•
Sub-Index Up Lim	96.30	96.30	0.000	•
Sub-Index Low Lim	88.94	88.94	−0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3				
Prop Sub-Index	90.68	90.68	0.000	•
Sub-Index Up Lim	97.33	97.33	0.000	•
Sub-Index Low Lim	88.06	88.06	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
Total HiCap/DDS				
Proposed SBI	92.37	92.37	−0.000	•
SBI: Upper Limit	96.12	96.12	0.000	•
SBI: Lower Limit	88.77	88.77	0.000	•
LEC SBI Out?				•
FCC SBI Out?				•
Wideband				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Trunking				
Trunking API	89.64	89.64	0.000	•
Trunking PCI	89.65	89.65	0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$32			
ISW	$0			
RDA	$38			
EDT	$52			
ITC	$1,852			
REVISION SHARING/LOW END	$32			
SHARING/LOW END ADJ	($1,917)			
TELECOMM.RELAY SVCS.	$26			
OTHER	$0			
TOTAL OF INDIVIDUALS	$114			
TOTAL EXOGENOUS	$114			
COMMON LINE				
Term Prem CCL Rate	0.05126	0.03126	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.04877			
Proposed PCI	102.6030	102.6030	0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	78.5689	78.5689	0.000	*
SBI: Upper Limit	82.4211	82.4211	0.000	*
SBI: Lower Limit	74.5714	74.5714	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Information				
Proposed SBI	73.6873	73.6873	−0.000	*
SBI: Upper Limit	81.3677	81.3677	0.000	*
SBI: Lower Limit	73.6184	73.6184	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Database Access				
Vert.Services: SBI	100.0000	100.0000	−0.000	*
SBI: Upper Limit	102.8433	102.8433	0.000	*
SBI: Lower Limit	93.0487	93.0487	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Database Access				
Proposed SBI	80.5680	80.5680	0.000	*
SBI: Upper Limit	80.5807	80.5807	0.000	*
SBI: Lower Limit	72.9084	72.9084	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Billing Name and Address				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	102.8433	102.8433	0.000	*
SBI: Lower Limit	93.0487	93.0487	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Traffic Sensitive				
TS API	74.9930	74.9930	0.000	*
TS PCI	74.9962	74.9962	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	97.8091	97.8091	0.000	*
SBI: Upper Limit	97.8150	97.8150	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Tandem Switched Transport				
Proposed SBI	101.6820	101.6820	−0.000	*
SBI: Upper Limit	101.7401	101.7401	0.000	*
SBI: Lower Limit	94.7579	94.7579	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
VG, MT, TG				
Proposed SBI	78.36	78.36	0.000	*
SBI: Upper Limit	84.04	84.04	0.000	*
SBI: Lower Limit	76.03	76.03	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Audio & Video				
Proposed SBI	78.14	78.14	0.000	*
SBI: Upper Limit	81.28	81.28	−0.000	*
SBI: Lower Limit	73.54	73.54	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
HiCap				
DS1				
Prop Sub–Index	85.97	85.97	−0.000	*
Sub–Index Up Lim	72.49	72.49	−0.000	*
Sub–Index Low Lim	66.56	66.56	−0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3				
Prop Sub–Index	77.76	77.76	0.000	*
Sub–Index Up Lim	85.85	85.85	0.000	*
Sub–Index Low Lim	77.67	77.67	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
Total HiCap/DDS				
Proposed SBI	88.35	88.35	0.000	*
SBI: Upper Limit	76.15	76.15	0.000	*
SBI: Lower Limit	68.90	68.90	0.000	*
LEC SBI Out?				*
FCC SBI Out?				
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				
Total Trunking				
Trunking API	77.47	77.47	0.000	*
Trunking PCI	79.92	79.92	−0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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Filing Entity: UTNW – United Telephone System –
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02636			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$151			
ISW	$0			
RDA	$0			
EDT	$760			
ITC	$336			
REMOVAL SHARING/LOW END	$1,216			
REVISION SHARING/LOW END	$1,475			
SHARING/LOW END ADJ	($610)			
TELECOMM.RELAY SVCS.	$77			
OTHER	$0			
TOTAL OF INDIVIDUALS	$3,207			
TOTAL EXOGENOUS	$3,207			
COMMON LINE				
Term Prem CCL Rate	0.02639	0.02639	0.00000	*
Orig Prem CCL Rate	0.01000	0.01000	0.00000	*
g	0.04876			
Proposed PCI	109.1061	109.1061	0.0000	*

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Filing Entity: UTOH – United of Ohio
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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	95.8816	95.8816	−0.000	*
SBI: Upper Limit	100.4121	100.4121	0.000	*
SBI: Lower Limit	90.8490	90.8490	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	84.5644	84.5644	0.000	*
SBI: Upper Limit	93.4601	93.4601	−0.000	*
SBI: Lower Limit	84.5561	84.5561	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	107.1632	107.1632	0.000	*
SBI: Lower Limit	96.9571	96.9571	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	98.7500	98.7500	0.000	*
SBI: Upper Limit	95.1160	95.1160	0.000	*
SBI: Lower Limit	96.0582	96.0582	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	108.2500	108.2500	0.000	*
SBI: Upper Limit	107.1632	107.1632	0.000	*
SBI: Lower Limit	96.9571	96.9571	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	90.3192	90.3192	−0.000	*
TS PCI	90.3225	90.3225	−0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	102.2308	102.2303	0.000	*
SBI: Upper Limit	102.2571	102.2571	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	97.6063	97.6063	−0.000	*
SBI: Upper Limit	104.3023	104.3023	−0.000	*
SBI: Lower Limit	97.1443	97.1443	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	91.85	91.85	0.000	*
SBI: Upper Limit	98.20	98.20	0.000	*
SBI: Lower Limit	88.85	88.85	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	88.80	88.80	0.000	*
SBI: Upper Limit	95.34	95.34	−0.000	*
SBI: Lower Limit	86.26	86.26	−0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub−Index	90.84	90.84	−0.000	*
Sub−Index Up Lim	100.34	100.34	−0.000	*
Sub−Index Low Lim	90.79	90.79	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
DS3				
Prop Sub−Index	83.64	83.64	0.000	*
Sub−Index Up Lim	92.41	92.41	0.000	*
Sub−Index Low Lim	83.61	83.61	0.000	*
LEC Sub−Ind Out?				*
FCC Sub−Ind Out?				*
Total HiCap/DDS				
Proposed SBI	91.18	91.18	−0.000	*
SBI: Upper Limit	100.40	100.40	−0.000	*
SBI: Lower Limit	90.84	90.84	−0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	92.39	92.39	0.000	*
Trunking PCI	95.66	95.66	0.000	*
LEC API Above PCI?				LO
FCC API Above PCI?				LO

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-Index Low Lim				*
LEC Sub-Ind Out?				
FCC Sub-Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02836			
X for CL, TS and Trk	0.04300			
X for IX	0.04000			
EXOGENOUS CHANGES in thou				
SPF	$0			
DEM	$0			
LTS/TRS	$68			
ISW	$0			
RDA	$391			
EDT	$225			
ITC	$695			
REMOVAL SHARING/LOW END	$60			
REVISION SHARING/LOW END	($1,073)			
SHARING/LOW END ADJ	$58			
TELECOMM.RELAY SVCS.	$0			
OTHER	$483			
TOTAL OF INDIVIDUALS	$483			
TOTAL EXOGENOUS				
COMMON LINE				
Term Prem CCL Rate	0.01615	0.01615	-0.00000	•
Orig Prem CCL Rate	0.01000	0.01000	0.00000	
g	0.02136			•
Proposed PCI	104.9977	104.9977	-0.0000	

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	92.2966	92.2966	0.000	•
SBI: Upper Limit	96.8326	96.8326	0.000	•
SBI: Lower Limit	87.6104	87.6104	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Information				
Proposed SBI	85.0127	85.0127	-0.000	•
SBI: Upper Limit	93.9614	93.9614	-0.000	•
SBI: Lower Limit	85.0127	85.0127	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Database Access				
Vert.Services: SBI	103.8068	103.8068	0.000	•
SBI: Upper Limit	103.8068	103.8068	0.000	•
SBI: Lower Limit	93.9204	93.9204	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Database Access				
Proposed SBI	99.0799	99.0799	0.000	•
SBI: Upper Limit	99.0799	99.0799	0.000	•
SBI: Lower Limit	90.5634	90.5634	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Billing Name and Address				
Proposed SBI	103.8068	103.8068	0.000	•
SBI: Upper Limit	103.8068	103.8068	0.000	•
SBI: Lower Limit	93.9204	93.9204	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Traffic Sensitive				
TS API	84.8642	84.8642	0.000	•
TS PCI	84.8642	84.8642	-0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•
INTEREXCHANGE				
Interexchange API	78.70	78.70	0.000	•
Interexchange PCI	99.30	99.30	-0.014	LOW
LEC API Above PCI?				LOW
FCC API Above PCI?				LOW

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	99.3533	99.3533	0.000	•
SBI: Upper Limit	99.3533	99.3533	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Tandem Switched Transport				
Proposed SBI	96.6720	96.6720	-0.000	•
SBI: Upper Limit	101.3408	101.3408	-0.000	•
SBI: Lower Limit	94.3856	94.3856	-0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
VG, MT, TG				
Proposed SBI	90.40	90.40	0.000	•
SBI: Upper Limit	91.81	91.81	-0.000	•
SBI: Lower Limit	83.06	83.06	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Audio & Video				
Proposed SBI	97.36	97.36	0.000	•
SBI: Upper Limit	98.34	98.34	0.000	•
SBI: Lower Limit	88.98	88.98	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
HiCap				
DS1				
Prop Sub-Index	97.90	97.90	-0.000	•
Sub-Index Up Lim	102.42	102.42	-0.000	•
Sub-Index Low Lim	92.66	92.66	-0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
DS3				
Prop Sub-Index	95.54	95.54	-0.000	•
Sub-Index Up Lim	95.55	95.55	0.000	•
Sub-Index Low Lim	88.45	88.45	0.000	•
LEC Sub-Ind Out?				•
FCC Sub-Ind Out?				•
Total HiCap/DDS				
Proposed SBI	97.32	97.32	-0.000	•
SBI: Upper Limit	102.75	102.75	-0.000	•
SBI: Lower Limit	92.97	92.97	-0.000	•
LEC SBI Out?				•
FCC SBI Out?				•
Wideband				
Proposed SBI	0.00	NONE	0.000	•
SBI: Upper Limit	0.00	NONE	0.000	•
SBI: Lower Limit	0.00	NONE	0.000	•
LEC SBI Out Bounds?				•
FCC SBI Out Bounds?				•
Total Trunking				
Trunking API	92.01	92.01	0.000	•
Trunking PCI	92.01	92.01	-0.000	•
LEC API Above PCI?				•
FCC API Above PCI?				•

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
Sub–I	0.0000	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

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Filing Entity: UTSE – United Telephone System – S
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DT	0.00	NONE	0.000	*
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–Index Low Lim				*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				
DS3 DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
Sub–I	0.00	NONE	0.000	*
LEC Sub–Ind Out?				*
FCC Sub–Ind Out?				*

Other

ANALYZER
Filing Date: 4/1/94
Filing Entity: LTNE
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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02634			
X for CL, TS and SP	0.03300			
X for IX	0.03000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	$0			
LTS/TRS	$55			
ISW	$0			
RDA	$0			
EDT	$0			
ITC	$110			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	($656)			
TELECOMM.RELAY SVCS.	$13			
OTHER	$2			
TOTAL OF INDIVIDUALS	($479)			
TOTAL EXOGENOUS	($479)			
COMMON LINE				
Term Prem CCL Rate	0.00288	0.00288	0.00000	*
Orig Prem CCL Rate	0.00288	0.00288	0.00000	*
g	0.05221			
Proposed PCI	102.3472	102.3472	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	95.3725	95.3725	0.000	*
SBI: Upper Limit	100.2855	100.2856	-0.000	*
SBI: Lower Limit	90.7345	90.7346	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	86.2620	86.2620	0.000	*
SBI: Upper Limit	93.7250	93.7251	-0.000	*
SBI: Lower Limit	84.7989	84.7989	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	93.0761	93.0761	0.000	*
SBI: Upper Limit	95.5550	95.5550	-0.000	*
SBI: Lower Limit	86.4545	86.4546	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	95.5550	95.5550	0.000	*
SBI: Upper Limit	95.5550	95.5550	-0.000	*
SBI: Lower Limit	86.4545	86.4546	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	----------	NONE	----------	LOW
SBI: Upper Limit	102.6633	NONE	102.663	HIGH
SBI: Lower Limit	92.8859	NONE	92.886	HIGH
LEC SBI Out Bounds?				LOW
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	91.0041	91.0041	0.000	*
TS PCI	91.0041	91.0041	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	86.99	86.99	-0.000	*
Interexchange PCI	86.99	86.99	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	97.8665	97.8665	-0.000	*
SBI: Upper Limit	97.8665	97.8665	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	97.8674	97.8674	0.000	*
SBI: Upper Limit	99.8442	99.8443	-0.000	*
SBI: Lower Limit	92.9022	92.9022	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	87.92	87.92	0.000	*
SBI: Upper Limit	92.30	92.30	-0.000	*
SBI: Lower Limit	83.51	83.51	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	87.82	87.82	0.000	*
SBI: Upper Limit	92.06	92.06	-0.000	*
SBI: Lower Limit	83.30	83.30	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	95.84	95.84	-0.000	*
Sub-Index Up Lim	100.73	100.73	-0.000	*
Sub-Index Low Lim	91.14	91.14	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	0.00	NONE	0.000	*
Sub-Index Up Lim	0.00	NONE	0.000	*
Sub-Index Low Lim	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	95.71	95.71	0.000	*
SBI: Upper Limit	100.51	100.51	-0.000	*
SBI: Lower Limit	90.93	90.93	-0.000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.00	NONE	0.000	*
SBI: Upper Limit	0.00	NONE	0.000	*
SBI: Lower Limit	0.00	NONE	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	92.26	92.26	0.000	*
Trunking PCI	92.26	92.26	-0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING----------				
Tandem Switched Transport Density Zone 1				
Prop $	97.8922	97.8922	0.000	*
Sub-I	102.7808	102.7809	-0.000	*
Sub-I	88.0978	88.0979	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	97.8912	97.8912	0.000	*
Sub-I	102.7808	102.7809	-0.000	*
Sub-I	88.0978	88.0979	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	97.8862	97.8862	-0.000	*
Sub-I	102.7808	102.7809	-0.000	*
Sub-I	88.0978	88.0979	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	-99999.00	NONE	**********	LOW
Sub-I	92.30	NONE	92.296	HIGH
Sub-I	79.11	NONE	79.111	HIGH
LEC Sub-Ind Out?				LOW
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	-99999.00	NONE	**********	LOW
Sub-I	92.30	NONE	92.296	HIGH
Sub-I	79.11	NONE	79.111	HIGH
LEC Sub-Ind Out?				LOW
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	91.99	91.99	-0.000	*
Sub-I	92.30	92.30	-0.000	*
Sub-I	79.11	79.11	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING----------				
DS1 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	95.0589	95.0589	-0.000	*
Sub-I	100.7348	100.7348	-0.000	*
Sub-I	86.3441	86.3441	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	96.7040	96.7040	-0.000	*
Sub-I	100.7348	100.7348	-0.000	*
Sub-I	86.3441	86.3441	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	98.2871	98.2871	0.000	*
Sub-I	100.7348	100.7348	-0.000	*
Sub-I	86.3441	86.3441	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING----------				
DS3 Special Access Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
GENERAL				
GNPPI	0.02834			
X for CL, TS and SP	0.03300			
X for IX	0.00000			
EXOGENOUS CHANGES in thous				
SPF	$0			
DEM	($790)			
LTS/TRS	$0			
ISW	$0			
RDA	$582			
EDT	$523			
ITC	($3,141)			
REMOVAL SHARING/LOW END	$0			
REVISION SHARING/LOW END	$0			
SHARING/LOW END ADJ	$298			
TELECOMM.RELAY SVCS.	$0			
OTHER	($2,528)			
TOTAL OF INDIVIDUALS	($2,528)			
TOTAL EXOGENOUS				
COMMON LINE				
Term Prem CCL Rate	0.00684	0.00683	0.00000	*
Orig Prem CCL Rate	0.00684	0.00683	0.00000	*
g	0.03980			
Proposed PCI	87.6796	87.6796	-0.0000	*

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	LEC	FCC	Delta	Flag
TRAFFIC SENSITIVE				
Local Switching				
Proposed SBI	94.6578	94.6578	-0.000	*
SBI: Upper Limit	99.5220	99.5220	0.000	*
SBI: Lower Limit	90.0437	90.0437	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Information				
Proposed SBI	82.9501	82.9501	0.000	*
SBI: Upper Limit	91.3345	91.3345	-0.000	*
SBI: Lower Limit	82.6360	82.6360	0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Database Access				
Vert.Services: SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	103.7962	103.7962	0.000	*
SBI: Lower Limit	93.9108	93.9108	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Database Access				
Proposed SBI	94.3409	94.3409	0.000	*
SBI: Upper Limit	97.9223	97.9223	0.000	*
SBI: Lower Limit	88.5963	88.5963	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Billing Name and Address				
Proposed SBI	100.0000	NONE	100.000	HIGH
SBI: Upper Limit	105.0000	NONE	105.000	HIGH
SBI: Lower Limit	95.0000	NONE	95.000	HIGH
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Traffic Sensitive				
TS API	90.0058	90.0058	0.000	*
TS PCI	90.4762	90.4762	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*
INTEREXCHANGE				
Interexchange API	0.00	NONE	0.000	*
Interexchange PCI	0.00	NONE	0.000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Interconnection Charge				
Proposed SBI	98.9871	98.9871	0.000	*
SBI: Upper Limit	99.0211	99.0211	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Tandem Switched Transport				
Proposed SBI	100.0000	100.0000	0.000	*
SBI: Upper Limit	101.0015	101.0015	-0.000	*
SBI: Lower Limit	94.0700	94.0700	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
VG, MT, TG				
Proposed SBI	101.3641	101.3641	0.000	*
SBI: Upper Limit	108.3415	108.3415	0.000	*
SBI: Lower Limit	98.0232	98.0232	-0.000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Audio & Video				
Proposed SBI	95.9636	95.9636	0.0000	*
SBI: Upper Limit	99.7754	99.7754	-0.0000	*
SBI: Lower Limit	90.2730	90.2730	-0.0000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
HiCap				
DS1				
Prop Sub-Index	84.9775	84.9776	-0.0000	*
Sub-Index Up Lim	90.7262	90.7262	-0.0000	*
Sub-Index Low Lim	82.0856	82.0856	-0.0000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3				
Prop Sub-Index	80.0925	80.0925	-0.0000	*
Sub-Index Up Lim	87.9113	87.9113	0.0000	*
Sub-Index Low Lim	79.5388	79.5388	0.0000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Total HiCap/DDS				
Proposed SBI	86.4613	86.4613	-0.0000	*
SBI: Upper Limit	92.1104	92.1104	0.0000	*
SBI: Lower Limit	83.3380	83.3380	0.0000	*
LEC SBI Out?				*
FCC SBI Out?				*
Wideband				
Proposed SBI	0.0000	NONE	0.0000	*
SBI: Upper Limit	0.0000	NONE	0.0000	*
SBI: Lower Limit	0.0000	NONE	0.0000	*
LEC SBI Out Bounds?				*
FCC SBI Out Bounds?				*
Total Trunking				
Trunking API	91.5458	91.5458	-0.0000	*
Trunking PCI	93.3670	93.3670	0.0000	*
LEC API Above PCI?				*
FCC API Above PCI?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
Tandem Switched Transport Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
Tandem Switched Transport Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 1				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 2				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
VG DTT/EF Density Zone 3				
Prop $	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
Sub-I	0.00	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

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	LEC	FCC	Delta	Flag
TRUNKING				
DS1 Special Access Density Zone 1				
Prop $	83.1471	83.1471	-0.000	*
Sub-I	88.9936	88.9936	0.000	*
Sub-I	76.2802	76.2802	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 2				
Prop $	84.3031	84.3033	-0.000	*
Sub-I	91.6040	91.6040	-0.000	*
Sub-I	78.5178	78.5178	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Special Access Density Zone 3				
Prop $	87.7142	87.7142	-0.000	*
Sub-I	93.4067	93.4067	0.000	*
Sub-I	80.0829	80.0829	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS1 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

ANALYZER
Filing Date: 4/1/94
Filing Entity: SNCT
Transmittal Number: 605
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	LEC	FCC	Delta	Flag
TRUNKING				
DS3 Special Access Density Zone 1				
Prop $	79.3785	79.3785	0.000	*
Sub-I	87.6208	87.6208	0.000	*
Sub-I	75.1035	75.1035	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 2				
Prop $	79.7434	79.7434	-0.000	*
Sub-I	87.7979	87.7979	-0.000	*
Sub-I	75.2554	75.2554	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Special Access Density Zone 3				
Prop $	82.5245	82.5245	-0.000	*
Sub-I	88.5981	88.5981	-0.000	*
Sub-I	75.9412	75.9412	-0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 DTT/EF Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 1				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 2				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*
DS3 Combined Density Zone 3				
Prop $	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
Sub-I	0.0000	NONE	0.000	*
LEC Sub-Ind Out?				*
FCC Sub-Ind Out?				*

FCC 94-189

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions	)	CC Docket No. 91-273

Second Report and Order

Adopted: July 14, 1994 Released: August 1, 1994

By the Commission: Commissioner Barrett issuing a separate statement.

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I. INTRODUCTION AND SUMMARY

1. By this action, the Commission amends Section 63.100 of its rules to expand the present telephone service outage reporting requirements. The reporting requirements provide the Commission with a systematic means for receiving prompt notice and allow the Commission to perform detailed analysis of significant telecommunications service outages. The amendments adopted here will improve the Commission's ability to monitor the reliability of the telephone networks locally, regionally and nationally. The Commission will also be able to determine whether carriers are aware of and are implementing recommended industry "best practices" applicable to outages experienced by their networks, the extent to which these best practices are effective in reducing telephone service outages and whether any additional best practices need to be formulated.

2. Common carriers that operate either transmission or switching facilities will hereafter be required to notify the Commission of service outages that potentially affect as few as 30,000 customers or that affect certain special facilities regardless of the number of potentially-affected customers. Our new rules will triple the number of central offices subject to our reporting requirements. Carriers will also have to report fire-related incidents in certain of their facilities if 1000 or more service lines are affected. Section 63.100, as amended, requires carriers to use blocked calls, where technically feasible, to determine whether criteria for reporting certain types of outages have been reached. Additionally, these amendments extend from 90 to 120 minutes the time period within which initial notification of outages potentially affecting 50,000 or more customers must be given to the Commission. This

additional time will allow carriers to focus on restoring network service in the critical first hours following an outage.

3. The rules also require that final outage reports identify the underlying cause of an outage and evaluate the effectiveness of industry best practices to avoid outages. Finally, the rules require carriers to notify the management of any 911 facilities affected by an outage.

4. We refer to the Commission's Network Reliability Council the following issues: whether other entities, such as satellite and terrestrial wireless carriers, should report outages to 911 and other special facilities; whether and how a funding structure for the Internetwork Interoperability Test Plan should be designed; and whether customers of carriers are adequately informed of service outages.

II. BACKGROUND

5. In the Report and Order, 7 FCC Rcd 2010 (1992), (Report and Order), the Commission added Section 63.100 to its rules requiring that local exchange or interexchange common carriers operating either transmission or switching facilities notify the Commission within 90 minutes if they experience service outages potentially affecting 50,000 or more customers and lasting 30 or more minutes. Additionally, the Commission referred to the Network Reliability Council (NRC)[1] the questions of whether the reporting threshold should be lower than 50,000 customers, and whether a separate threshold for reporting outages affecting 911 services or major airports should be adopted.

6. On May 11, 1992, the NRC recommended to the Commission that the filing threshold for initial service disruption reports (due 90 minutes after commencement of an outage) remain at 50,000 customers. The NRC further recommended, however, that, for a six month trial period, the threshold for final service disruption reports (due 30 days after an outage) be lowered to 30,000 customers. The NRC stated that it would make further recommendations at the end of the six month period, based on experience with the lower reporting standard. During the pendency of its recommendations, the NRC requested that the industry voluntarily comply with the lower reporting threshold for final reports. The NRC further recommended that any outage affecting

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[1] The NRC was formed to provide the Commission and the industry with recommendations for avoiding public telephone network outages and, if they occur, for minimizing their impact. See Report and Order at para. 15; Notice at note 2.

special offices and facilities[2] be reported regardless of the number of customers affected.[3] The NRC requested that the industry also voluntarily comply with this recommendation while it was under consideration by the Commission.

7. On December 29, 1992, the NRC forwarded to the Commission the final report of its Threshold Reporting Group (TRG). The report set forth the following final outage reporting recommendations:[4]

a) Carriers should report to the Commission within 90 minutes outages lasting 30 minutes or more and potentially affecting 50,000 or more customers, with a final report to be filed within 30 days, as required by the Report and Order. The Commission, however, should consider extending the 90 minute deadline for the initial reports to 120 minutes.

b) Carriers should report certain special offices and facilities[5] failures regardless of the number of customers affected and should follow the alternative procedures for reporting failures with national security or emergency preparedness (NS/EP) implications as described in the October 19, 1992 recommendations of the NRC.[6]

c) Carriers should notify the Commission within three days of any outage lasting 30 minutes or more and potentially affecting between 30,000 and 50,000 customers, and should submit a final report of such outages to the Commission within 30 days.[7]

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[2] "Special offices and facilities" are defined as major airports, major military installations, key government facilities, nuclear power plants and 911 tandems.

[3] Letter from the Chairman, Network Reliability Council, to the Chairman, Federal Communications Commission, May 11, 1992. This document, along with other Council documents mentioned herein may be copied in room 6325 of the Commission's offices at 2025 M Street N.W., Washington, D.C. 20554 or acquired through the Commission's duplicating contractor, ITS, Inc., at 2100 M Street, N.W., Suite 140, Washington, D.C. 20037, (202) 857-3800.

[4] Letter from Chairman, Network Reliability Council, to Chairman, Federal Communications Commission, December 29, 1992

[5] See "Special Facilities - Background" infra.

[6] See October 18, 1992 letter from Chairman, Network Reliability Council to Chairman, Federal Communications Commission. See also "Special Facilities - Background" infra.

[7] Information proposed to be submitted for the 3 day notice would be somewhat less detailed than that now requested for the 90 minute initial service disruption reports.

d) Interexchange carriers should be permitted to use blocked calls to determine whether criteria for reporting an outage have been reached.

e) For a period of one year, reports of outages potentially affecting 30,000 to 50,000 customers should not be kept confidential. This issue should be reexamined by the Commission at the end of that period and, if the Commission concludes that the reports should not be disclosed to the public in the future, that protection should be extended to the outage reports of all carriers.

f) These reporting thresholds should be used to advance the public interest objectives of improving network reliability and enhancing Commission oversight capability and should not be viewed as standards for levying fines and forfeitures.

8. In May of 1993, the NRC adopted and forwarded to the Commission the final reports of its eight other study groups. The NRC's Fire Prevention Focus Team recommended, inter alia, that carriers report all fire-related incidents that affect service to 100 or more service lines for a period of 30 minutes or longer within 24 hours. This study group further suggested that the reports be submitted to the Exchange Carriers Standards Association, now called the Alliance for Telecommunications Industry Solutions (ATIS), for analysis.[8]

9. In the Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 8 FCC Rcd 8517 (released December 1, 1993), (Notice), the Commission proposed to amend the outage reporting requirements established in the Report and Order.[9] The Notice proposed to adopt most of the reporting recommendations of the NRC. The Notice, however, modified the NRC's reporting recommendations in several significant respects. First, the Notice proposed to require carriers to report fire-related incidents to the Commission instead of ATIS. The Notice also rejected any special determination regarding the confidentiality of reports, stating that the Commission would deal with confidentiality concerns through the procedures set forth in Section 0.459 of the Commission's rules, 47 C.F.R. §0.459. In addition, while not proposing establishment of

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[8] See Network Reliability: A Report to the Nation, (publisher National Engineering Consortium) June 1993, (Report to the Nation), Section G, p. 28.

[9] The Commission also granted the petition for reconsideration filed by United States Telephone Association (USTA), which asked the Commission to eliminate the exemption of competitive access providers (CAPs) from the reporting requirements. See Notice at para. 26.

performance levels on the basis of any recommendations of the NRC, the Notice invited comment on several of these recommendations and stated that additional rules might later become necessary to ensure that best practices recommended by the NRC were not ignored. Finally, the Notice proposed that final outage reports identify the underlying causes of an outage and discuss any applicable industry best practices recommended by the NRC. Sixteen comments and 14 reply comments were filed.[10]

III. COMMENTS AND DISCUSSION

A. Issues

10. 30,000 Customer Threshold - Background and Comments: All parties commenting on this issue support establishing the 30,000 customer threshold for reporting outages generally, as proposed in the Notice. The commenters concur that this lower threshold will provide significantly more reliability information to the Commission and the industry than the current 50,000 threshold without imposing substantial additional costs on the carriers.[11] TCA notes that the Commission can reassess this threshold after a year and consider lowering the standard still further if the threshold does not lead to the expected increase in information concerning network reliability.[12] Similarly, AT&T notes that subcommittee T1A1.2 of ATIS Committee T1 is studying network integrity and reliability and is developing a method for quantifying the severity of service outages that may allow future refinements of the

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[10] Comments were filed by: the New York City Department of Telecommunications and Energy (New York); Teleport Communications Group (TCG); United States Telephone Association (USTA); US West Communications (US West); Utilities Telecommunications Council (UTC). Comments and reply comments were filed by Ameritech Operating Companies (Ameritech); AT&T; Bell Atlantic Telephone Companies (Bell Atlantic); BellSouth Corporation (BellSouth); The General Services Administration (GSA); the National Communications System (NCS); the New York Telephone Company and the New England Telephone and Telegraph Company (NYNEX); Pacific Bell and Nevada Bell (Pacific); Sprint Corporation (Sprint); Southwestern Bell Telephone Company (Southwestern); and the Tele-Communications Association (TCA). Reply comments were filed by MCI Telecommunications Corporation (MCI); the National Emergency Number Association (NENA); and Rochester Telephone Corporation (Rochester).

[11] Pacific conditions its support on the establishment of uniform customer calculations methods for LECs and IXCs. See Pacific comments at 6.

[12] TCA comments at 4.

reporting criteria.[13] NYNEX warns that any further lowering of the threshold will create an unacceptable administrative burden.[14]

11. 30,000 Customer Threshold - Discussion: All parties essentially agree with the reasoning of the Notice on this issue, and we will adopt the change as proposed. Carriers have been filing reports voluntarily in accordance with the 30,000 customers threshold, and we have found that these reports provide the Commission with valuable additional information on network reliability. In particular, lowering the threshold triples the number of central offices that are subject to reporting.

12. Reporting Times - Background and Comments: All parties commenting on the issue of reporting times support the limits proposed in the Notice for filing initial and final reports: 120 minutes for outages that potentially affect 50,000 customers or special facilities, three days for 30,000 to 50,000 customers and for all reportable fire-related incidents, and 30 days for all final reports. Many commenters contend that the extended times for filing initial outage reports will allow more complete reports and will allow technicians to spend more time correcting the outages they are reporting.[15]

13. Reporting Times - Discussion: We continue to encourage carriers to report outages as soon as possible. Nonetheless, the additional 30 minutes provided as an outside limit for filing initial reports in the event of a major outage will allow carriers experiencing an outage to devote additional time at the outset to the essential task of restoring network services. In addition, although we recognize that two hours will usually not provide sufficient time to complete an investigation, we expect that the additional time proposed in the Notice will result in far fewer cursory initial reports. To date, we have not penalized carriers

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[13] AT&T comments at 4.

[14] NYNEX comments at 16.

[15] See, e.g., AT&T comments at 2 and UTC's comments at 3. While supporting these time limits, Sprint, Pacific and NYNEX caution that more complete outage information should not always be expected in initial reports, despite the additional time allowed for their submission, since discovery of the root causes of an outage often requires extensive investigation. They also note that significant additional information often is not discovered between 90 and 120 minutes after commencement of an outage. Sprint further suggests that the Commission allow supplementary reports to be filed after 30 days in cases where root cause analysis can not be completed in time for final reports.

that have missed the 90 minute filing period. We intend to enforce filing requirements more strictly in the future. The three days allowed for initial reports of outages at the 30,000 customers level will limit the burden of that new threshold significantly. Our experience with the process to date has been that outages in this range do not warrant immediate reporting as do large scale events. We, therefore, adopt these reporting times: initial reports shall be filed with the Commission within 120 minutes for outages affecting 50,000 or more customers; 3 days for outages affecting 30,000 to 50,000 customers; 3 days for reportable fire-related outages, as defined below, affecting fewer than 50,000 customers but at least 1000 lines. All final reports shall be filed with the Commission within 30 days.

14. Methods of Determining Thresholds for IXCs - Background: IXC switches, like LEC tandems, do not directly terminate specific subscriber lines, as do LEC central offices. IXCs, therefore, have used blocked calls as the basis for determining when reporting thresholds are reached. Because customers normally redial 3 times when their calling attempts are frustrated,[16] IXCs divide the number of blocked calls by a factor of 3 to determine the number of affected customers. The Notice proposed to permit IXCs to continue to use blocked calls in this way to determine whether an outage meets a reporting threshold.

15. Methods of Determining Thresholds for IXCs - Comments: Only Pacific opposes allowing IXCs to use blocked calls to calculate the number of customers potentially affected by an outage. Pacific argues that the methods used by CAPs, LECs and IXCs for determining whether reporting thresholds have been reached should be the same because reports will be used to compare the reliability performance of different carriers and competition between these different carriers is increasing. Pacific states that it is unclear how an IXC should calculate actual blocked calls on a fiber cable or digital cross-connect system (DCS), and there is no way for an IXC to measure calls destined for its network but that are blocked in the originating LEC. Pacific contends that the impact of a failure as measured by its proposed trunk-based method may be greater than that that would be measured using the blocked-calls method. Pacific states that the blocked-calls method may distort the ability of the FCC to obtain an accurate measure of reliability. Pacific contends that its method calculates the impact of an outage by its effect on elements common to different types of networks and could, therefore, be applied easily to CAPs, LECs and IXCs. Specifically, Pacific suggests that carriers report when service is disrupted in an end office serving 30,000 lines or more, a tandem serving 3,000 trunks or more, a DCS system serving the equivalent of 4.5 DS3s (message trunks) or 45 DS3 (non-trunks) or a cable/facility

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[16] Report of the Threshold Reporting Group of the Network Reliability Council, (April 20, 1992) p. 8.

carrying the equivalent of 125 T1s (message trunks) or 1,250 T1s (non-trunks). Where possible, carriers should examine failed network elements to determine the potential impact on customers using the formula: number of message trunks times 10 plus number of non-message trunk circuits = potential customers affected.[17]

16. MCI and Bell Atlantic oppose Pacific's suggested reporting method. MCI states that LECs and IXCs are dissimilar, and a common methodology should not be applied to both. MCI rejects as irrelevant Pacific's argument that IXCs are not aware of outages in the LEC network that prevent IXC calls, since the LEC, not the IXC, would report such outages.[18] Bell Atlantic states that Pacific's method would sacrifice a goal of the reporting requirement (knowledge of the impact of outages on customers) for administrative convenience.[19]

17. Ameritech, AT&T, BellSouth, Bell Atlantic, GSA, Southwestern and Sprint agree that use of blocked-call counts by IXCs and LECs for tandem offices when calculating reporting thresholds will provide consistent, accurate data.[20] AT&T argues that the Commission should require all carriers to use the blocked calls method.[21]

18. In reply, Pacific concedes that IXC use of the blocked calls method would be acceptable for determining the number of potentially affected customers, provided LECs were allowed to use either the same blocked calls method or the historical usage method suggested as part of the TRG Guidelines for tandem offices. Pacific states that this would be preferable to the use of diverse methods under the Commission's proposal. Pacific asserts, however, that the blocked calls and historical methods would only determine probable impact on customers, whereas the method suggested by Pacific would calculate potential customer impact based on a specified number of network elements, not on estimates about probable use of those elements at the time of an outage. Pacific contends that its method would provide a uniform standard for all carriers.[22]

19. Methods of Determining Thresholds for IXCs - Discussion: Among our primary objectives in requiring outage reporting are to

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[17] See Pacific comments at 2-3 and reply comments at 3.

[18] MCI reply comments at 6-8.

[19] Bell Atlantic reply comments at 3.

[20] See, e.g., AT&T reply comments at 4, BellSouth reply comments at 2.

[21] AT&T comments at 6-7, reply comments at 4.

[22] Pacific reply comments at 1-3.

become informed quickly of major disruptions and to gather, analyze, and share information useful to ensure network reliability. Carriers' networks differ not only in their capacities and functions, but also in the public interest consequences of failures. Because we were not certain that we had selected the proper methods for identifying reportable outages, we charged the Network Reliability Council with recommending changes. The Council represents diverse interests and its deliberations in several areas were contentious, particularly those involving reporting requirements. Its recommendations represent a consensus, and we are generally inclined to adopt its proposals, although we are not required to do so.[23]

20. Pacific's proposal, while rigorous and objective, does not account for differences among the LECs and IXCs, and it is not endorsed by other commenters. Our experience and the experience of the NRC with the use of real-time blocked call counts in identifying reportable IXC outages has demonstrated that this method adequately serves the purposes of the rule. We will, therefore, adopt the blocked calls method for IXCs as described in proposed Section 63.100(g). To promote consistency in the event that reliability comparisons are made, we will require IXCs to use blocked calls, where technically feasible. Where use of real-time blocked call counts is not possible, we will allow IXCs to use historical data to estimate, in good faith, the probable number of customers affected by an outage in an IXC switch or facility.[24] Where historical data are used to estimate the number of calls normally attempted during a comparable non-outage calling period, we note that IXCs should not divide the number of blocked calls by three to determine the number of customers potentially affected by an outage.

21. **Methods of Determining Thresholds in LEC Tandems - Background:** For the past two years LECs generally have been reporting outages to end offices where the number of lines served by that office exceeded the threshold number. LEC tandem offices aggregate traffic from end offices, and do not directly terminate specific lines. The TRG suggested to local exchange carriers that, under the two thresholds, they report tandem outages only if the

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[23] In analogous situations involving advisory committees formed under the Negotiated Rulemaking Act of 1990, agencies are required to use consensus recommendations to the maximum extent possible consistent with the legal obligations of the agency. 5 U.S.C. Section 583(a)(7).

[24] We may, of course, revisit this issue if, for example, the method eventually developed by ATIS T1 subcommittee T1A1.2, referred to above, promises to provide a more rigorous and accurate way of determining the potential impact of outages on customers than the methods we adopt in the present Order.

outages occur at a time when the tandems normally process 30,000 or 50,000 calls per half hour.[25] The Notice proposed, instead, that the number of customers potentially affected by a LEC tandem outage should equal the actual number of lines connected to switches directly homing on the tandem, regardless of the traffic usually passing through that tandem at any hour of the day.[26] The Notice specifically requested comments on this issue.

22. Methods of Determining Thresholds in LEC Tandems - Comments: Only TCA explicitly supports the method proposed in the Notice for determining reportable LEC tandem outages. TCA prefers this method because it is simple to administer and errs, if at all, on the side of being over-inclusive.[27]

23. Ameritech, Bell Atlantic, BellSouth, NYNEX, Sprint, and Southwestern oppose the line-counting method proposed in the Notice for determining LEC tandem outages. Bell Atlantic, among others, argues that this method will overstate substantially the impact of outages since tandems, though they normally serve 30,000 or more lines, rarely handle calling volumes of that magnitude.[28] BellSouth and others note that many tandems are part of an architecture involving alternate tandems and routes, that some tandems also tend independent company switches and that CAPs may home on LEC tandems, making determination of the number of lines actually dependent upon any given tandem very difficult.[29] Many of these commenters also challenge TCA's apparent view that some inaccuracy in reporting by virtue of over-inclusiveness or for the sake of administrative ease might be acceptable.[30]

24. NYNEX supports the method for LEC tandems suggested in the TRG Guidelines on the grounds that it will promote accuracy and fairness. The TRG Guidelines suggest reporting total tandem outages lasting 30 minutes or more in offices with 5,000 or more trunks (assuming each trunk can carry 10 customer calls per half hour) if the failure occurs during the time when the tandem normally processes 50,000 or more calls per half hour. NYNEX asserts this method would yield the most accurate determination of affected

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[25] See Suggested Guidelines for FCC Reportable Outages for Local Exchange Carriers, (TRG Guidelines) Report to the Nation, Section I, Attachment 1 at p. 3.

[26] Report and Order at n. 28.

[27] TCA comments at 5.

[28] Bell Atlantic comments at 6-7.

[29] BellSouth comments at 3.

[30] See, e.g., BellSouth reply comments at 2.

customers. NYNEX states that rare distortions of historical calling volumes such as those produced by natural disasters should not cause the Commission to reject this otherwise highly reliable method. NYNEX further argues that the TRG Guidelines method is presently employed by LECs and has led to LEC reports for the majority of outages.

25. If the Guidelines method is not used, NYNEX recommends that LECs be allowed to use the blocked calls method approved for IXCs. NYNEX agrees that use of the same method by IXCs and LECs would promote competitive fairness. In the Notice, the Commission justified use of blocked calls by IXCs on the grounds that the proposed lower reporting threshold (30,000 customers) would detect any significant outages that might otherwise go unreported as a result of the use of that method.[31] NYNEX notes that, since LECs, like IXCs, will be subject to the lower threshold, the blocked calls method will similarly make it likely that all significant LEC service disruptions will be reported. In addition, NYNEX observes that the Notice justified the use of blocked calls to determine the reporting threshold for IXCs, in part, on the basis that other IXCs were available to carry traffic.[32]

26. For many of the foregoing reasons, Ameritech, AT&T, BellSouth, Bell Atlantic, GSA, Southwestern and Sprint all support use of blocked call counts by LECs as well as IXCs to calculate reporting thresholds.[33] MCI agrees that, if a uniform reporting method were needed, LECs should be allowed to use the blocked calls method for outages in tandems, which are similar to IXC switches.[34] Ameritech states that LECs could determine blocked calls as accurately as IXCs and, along with Bell Atlantic, suggests that LECs be allowed to use either blocked calls or good faith estimates of usage based on comparable historical data.[35]

27. Methods of Determining Thresholds in LEC Tandems - Discussion: The alternatives discussed above for determining thresholds for reportable LEC tandem outages include the line-based method suggested in the Notice, the method developed by Pacific, the method suggested in the TRG Guidelines and favored by NYNEX,

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[31] Notice at para. 19.

[32] See NYNEX comments at 4-9 and reply comments at 3-5. See also Ameritech comments at 3.

[33] See, e.g., BellSouth reply comments at 2 and GSA reply comments at 5.

[34] MCI reply comments at 7.

[35] Ameritech comments at 3, reply comments at 1; Bell Atlantic comments at 7.

and the blocked-calls method. In determining the suitability of these methods for LECs and whether the preferable method(s) should be mandated, we recognize the need for consistency, simplicity and accuracy in carrier estimates of the number of customers potentially affected by an outage. We repeat, in this connection, that the purpose of setting numerical thresholds is to ensure the reporting of all "significant outages."[36] The phrase "potentially affects ... customers," as used in our rules, is intended to provide for the reporting of outages in cases where the carrier "should reasonably expect that at least ... [the threshold number of customers] will be deprived of telephone service," even when customer impact cannot be determined with certainty.[37] The number of customers potentially affected by an outage should, therefore, represent the most accurate estimate of the number that might actually have been affected.

28. We agree with Bell Atlantic and others that relying entirely on the number of lines or trunks served by an affected tandem would often tend to overstate the effect of an outage. This approach ignores the availability of alternative routing and the fact that tandems are designed to handle the expected peak periods of usage, which may not coincide with the outage period. We also note that these static methods for calculating the customer impact of LEC tandem outages, combined with certain architectures (a larger number of tandems, for example, that serve just under 30,000 lines) could diminish the number of tandem outages reported by a LEC even as the reliability of the LEC's network deteriorated. The outage reports that a carrier is required to submit for tandem outages should be related to the number of customers affected.

29. We believe, as we stated above, that blocked call counts have proven to be effective in keeping the Commission informed of significant IXC outages. This method also provides a representative means of tracking causes of service outages. It is now often possible to measure calls blocked in LEC tandems as well as IXC switches on a real time basis.[38] Therefore, we will approve the same blocked calls method for determining thresholds in LEC tandem outages that we have approved for IXC outages.[39]

30. To promote greater consistency, we will make the use of real-time blocked call counts in determining thresholds, where technically feasible, mandatory for LEC tandem outages. In the case

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[36] Report and Order at paragraphs 3 and 11.

[37] Report and Order at para. 11 (ital. added).

[38] We agree with MCI that LEC tandems are similar to IXC switches. MCI reply comments at 7.

[39] See note 24 above.

of outages where real-time blocked call counts are not technologically feasible, we will allow threshold determination based on historical experience as suggested in the TRG Guidelines,[40] with one exception.

31. When a historical measure of blocked calls is used, carriers may not use the historical data method described in the TRG Guidelines that would require reporting tandem outages only when they occur "during the time when the tandem normally processes ≥ 50K [or 30K] calls per half hour." As interpreted in some of the outage reports recently filed with the FCC, this would greatly understate the effect of some outages. When blocked calls are calculated to determine the number of customers potentially affected by an outage, the number to be calculated is the number affected throughout the period of the outage, whether under a real-time count or as estimated using applicable historical data. Where historical data are used to estimate the number of calls normally attempted during a comparable non-outage calling period, the number estimated should not be divided in determining the number of customers potentially affected by an outage.

32. Special Facilities - (911 and Major Airports) Background: The Notice proposed requiring reports to the Commission of all outages lasting 30 or more minutes and affecting certain "special offices and facilities," regardless of the number of customers affected, because outages affecting these facilities could be of grave concern even where relatively few communications were interrupted. "Special offices and facilities" include 911 tandems and major airports as well as major military installations, key government facilities, and nuclear power plants. Under the proposal, carriers would report outages affecting 911 facilities and major airports directly to the FCC. Carriers have been voluntarily reporting 911 and major airport-affecting outages to the FCC for the last two years pursuant to recommendations of the Network Reliability Council.

33. Special Facilities - (911) Comments: Commenters generally support the proposed special facilities reporting requirements.[41] Some, however, offer suggestions for restricting the scope of the requirements to eliminate reports they regard as unnecessary. Pacific states that 911-affecting outages are local in nature and that it is already required to report such outages to the California Public Utilities Commission. Therefore, Pacific argues,

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[40] Pacific, in its comments at 4, asks that the method to be used by CAPs to determine thresholds be specified. The method we have adopted for LECs and IXCs, we also adopt for CAPs.

[41] See, e.g., AT&T comments at 3; BellSouth comments at 2; GSA comments at 3; Sprint comments at 3; Southwestern Bell comments at 2: TCA comments at 4.

there is no reason for the FCC to collect information on outages that affect only 911.[42]

34. NENA, an organization that supports the implementation of a universal emergency telephone number system, contends that all 911 outages are significant and ought to be reported. NENA denies Pacific's claim that 911 services are exclusively intrastate and argues that California's 911 reporting requirement shows that compliance with the federal rule will not create a significant additional burden. NENA recommends that the Commission adopt a more precise definition or listing of the types of emergency services embraced by the special facilities rule.[43] NENA also suggests that the Commission consider requiring carriers to issue warnings of an outage to emergency communications officials. Because rerouting of 911 traffic is not always automatic, Public Service Answering Point (PSAP) officials must be aware of an actual or potential outage in order to implement rerouting procedures.[44] NENA also argues that cellular and satellite carriers are as important to emergency services as CAPs and the Commission should either require them to report or clarify the reason for their distinct treatment under the reporting requirements.[45]

35. **Special Facilities - (911) Discussion:** We reject suggestions that the reliability and efficiency of 911 systems are not of Commission interest. The Council's 911 Focus Report stated: "It is no exaggeration to say the American public depends on 9-1-1 service in its emergencies."[46] The reliability of 911 service is integrally related to our responsibilities under Section 1 of the Act, which include "promoting safety of life and property through the use of wire and radio communication."[47] Accordingly, the Commission will continue to collect data on 911 outages and will incorporate the proposed reporting requirement into our rules. However, the Commission staff has discovered that, as a result of the phrase "911 tandems" in the TRG Report and the examples of reportable 911 outages offered by the TRG in the attachments to its report, there is considerable carrier confusion about the proper criteria for reporting 911 outages. We will, therefore, revise our proposed rule to specifically require reports of 911 special facilities outages only when an outage disrupts more than 25% of the lines to any

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[42] Pacific comments at 7-8.

[43] NENA reply comments at 2-3.

[44] Id. at 4.

[45] Id. at 5-6.

[46] Report to the Nation, Section F at p. 1.

[47] 47 U.S.C. §151.

PSAP, without providing automatic rerouting to an alternative PSAP. We will also require carriers to indicate, when specifying the types of services affected by any reportable outage, when 911 is one of those services, to indicate whether or not more than 25% of the lines to any PSAP were disrupted and there was no automatic rerouting to an alternate PSAP. The Commission's staff is now examining, in the course of its routine follow-up investigations of 911 service outages, carrier practices relating to 911 services. We have found that carriers generally alert PSAP officials of outages affecting them. To ensure consistency in this regard, however, we will adopt NENA's proposal that we require notification of these officials.

36. We reject NENA's request regarding the definition of emergency services. The identification of 911 emergency services by the very number used to call them is specific and will be known to every carrier. 911 services are the only emergency services implicated in the special facilities reporting rule. Therefore, no revisions to the definition of emergency services are warranted at this time.[48]

37. Finally, the record developed in this proceeding does not clearly establish whether satellite and terrestrial mobile carriers should be subject to the 911 outage reporting requirements. In the Notice at para. 26, the Commission reasoned that the potential for growth of CAPs in the provision of services to all special facilities, not just 911, and the increasing possibility that an outage of CAP facilities could reach the 30,000 potentially affected customers threshold justified the CAP's inclusion in the outage reporting requirement. Many satellite communications carriers, as NENA concedes, have little or nothing to do with the everyday business of telephony and thus need not be subject to the reporting requirements.[49] Satellite carriers, however, have proposed a variety of new services using new technologies and frequency bands.[50] In addition, the NRC's 911 Focus Team recognized "that there are major unresolved issues in providing 911 service for

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[48] We have asked the Network Reliability Council to consider the extent to which essential services are compromised during network outages and to suggest guidelines for assuring these services are kept operational.

[49] NENA reply comments at note 7; see also the Report and Order at para. 24.

[50] See In the Matter of Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands, Notice of Proposed Rulemaking (Released February 18, 1994); see also Hughes Communications Galaxy, Inc. Application File Nos. 3/4-DSS-P/LA-94.

wireless and cellular customers"[51] that it did not examine in its study. Therefore, we refer the question of whether to expand the 911 and other special facilities outage reporting requirements to include terrestrial wireless and satellite carriers. We ask that it report on whether these and other providers of telecommunications services should report special facility service outages affecting 911 facilities to the Commission pursuant to the provisions of Section 63.100.

38. Special Facilities - (Major Airports) Comments: Several commenters suggested that unnecessary reports of outages affecting major airports would be filed if the proposed requirement were not modified. Pacific states that it has no way of knowing if an outage affects air traffic control links unless an airport informs the LEC. Pacific suggests that major airports affected by an outage should be required to contact a designated agency and that this agency should handle any necessary reporting, with assistance from the service provider, so that carriers could avoid reporting outages affecting airports only in trivial ways, e.g., affecting only pay phones at airports.[52] AT&T suggested that an airport outage report should only be required if 50% or more of the air traffic control links or other FAA communications links to any major airport are affected. AT&T notes that this is the present voluntary practice and has not been found inadequate.[53] US West recommends that only mission-affecting outages be reported.[54] MCI agrees with AT&T, since FAA communications links for major airports are fully redundant and loss of 50% of the links alone would not cause any loss of service. MCI states that such reporting would be consistent with the NRC Steering Committee's understanding.[55] Bell Atlantic supports Pacific's position.[56] Southwestern Bell finds the suggestions of AT&T, Pacific and US West all acceptable in this regard.[57]

39. Special Facilities - (Major Airports) Discussion: Under the voluntary system of outage reporting that has been in place since

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[51] Report to the Nation, Section F, p. 4.

[52] Pacific comments at 9.

[53] AT&T comments at 3.

[54] AT&T reply comments at 4-5 and Pacific reply comments at 4, referring to US West comments at 3. (Pacific also supports AT&T's suggestion, as an alternative).

[55] MCI reply comment at 5.

[56] Bell Atlantic reply comments at 4.

[57] Southwestern Bell reply comments at 3.

June 1, 1992, the FCC has received reports of outages that affect major airports. Until recently, AT&T has had principal responsibility for air traffic control telecommunications at airports under its contract with the FAA. AT&T has interpreted the voluntary reporting guidelines to require reports for outages affecting major airports under the 50% criterion described above. In addition to outages affecting major airport tower communications, AT&T has reported Air Route Traffic Control Center (ARTCC) outages. The ARTCCs in the FAA system handle intertower traffic above 10,000 feet. AT&T, under its FAA contract, provided telecommunications services for 19 of the 21 centers. In addition to outages affecting 50% of the FAA ARTCC circuits, AT&T reported to the FCC: any outage that caused an ARTCC or major airport to lose its radar; any ARTCC or major airport outage that was likely to be publicized; any outage that caused a loss of both primary and backup facilities at any ARTCC or major airport; and any outage to an ARTCC or major airport that is deemed important by the FAA as indicated by FAA inquiry to the carrier management personnel assigned to the FAA region in which the outage occurred. All AT&T major airport-affecting outages appear to have been reported under these criteria.

40. Pacific's suggestion, on the other hand, is untested. Moreover, NCS states that the national security/emergency preparedness (NS/EP) concerns that warrant the submission of reports on outages that affect government and military installations and nuclear power plants to the NCS do not apply to airports.[58] US West's concerns seem to be addressed by AT&T's 50% criterion, which is designed to exclude outages that would not be mission-affecting. The 50% criterion should also help eliminate unnecessary reports the FCC has received from LECs contracted to provide service to small radar and radio facilities dispersed throughout each ARTCC area. These facilities are usually redundant and not considered crucial to major airport operations. Reports of outages at these facilities as "major airport-affecting" are usually discovered upon FCC follow-up to have been thought too insignificant to require additional investigation or reporting by the FAA,[59] which operates its own extensive monitoring system. Moreover, MCI is completing construction of the LINCs system, which will be used in the future for FAA air traffic control telecommunications. Because this system will contain even greater redundancy than the current AT&T System, we conclude that AT&T's proposed standard, which MCI fully supports, is a sound approach. Therefore, we reject Pacific's and US West's suggestions and accept AT&T's proposal. We will apply the 50% criterion to our major airport-affecting outage reporting requirement. We will also

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[58] NCS reply comments at 2.

[59] See, e.g., US West report for southwestern Colorado, April 16, 1993.

require carriers to adopt the other standards, described above, that AT&T has used to determine reportable outages affecting major airports.

41. Special Facilities - (NS/EP Facilities) Background: The Notice proposed that any mission-affecting telecommunications outage at a nuclear power plant, a major military installation or a key government facility be reported by the affected facility to the NCS,[60] which will: 1) forward an initial (120 minute) and final (30 day) written report of the outage to the Commission, supplying information required by § 63.100 of the rules for all special facilities outages; 2) forward an edited version; or 3) retain the report at the NCS, depending on the degree to which notification of the outage might affect NS/EP concerns. Outages at nuclear power plants, major military installations and key government facilities have been reported voluntarily under these procedures to the FCC for the past 18 months.

42. Special Facilities - (NS/EP Facilities) Comments: Though most commenters agreed with our proposed procedures for reporting these special facilities outages through the NCS, several commenters suggested changes or clarifications. NYNEX asked the Commission to clarify whether initial special facilities reports made under the auspices of the NCS are to be made by NCS or the carrier. If by the NCS, NYNEX requests the carrier be required to consult with the NCS and, if not, the NCS should be required to report to the carrier that an outage has been reported so that the carrier can provide a final written report to the NCS for filing with the FCC. NYNEX suggests that the carrier be required to submit final report information within 20 days of the outage so that the NCS can meet the 30 day deadline.[61] Pacific asks the Commission to clarify that all nuclear power plants are considered to be special facilities and that a member agency of the NCS will determine if there has been a mission-affecting outage. Pacific argues that the NCS should provide the carriers with a list of special offices and facilities or at least the criteria used to designate the facilities subject to this reporting requirement in order to assist LECs in reporting, diversity planning and reliability decisions.[62] Pacific states that a 20 day limit for carriers to provide outage reports to the NCS is unnecessarily short since NCS will not amend those reports. Pacific

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[60] NCS, operating under the direction of the Secretary of Defense, coordinates planning for NS/EP telecommunications needs among its twenty-three member federal departments and entities.

[61] NYNEX comments at 19.

[62] Pacific comments at 10.

suggests a 28 day limit.[63] AT&T agrees that clarification regarding NCS/Carrier cooperation as requested by NYNEX would be helpful.[64] UTC suggests that the NCS provide a report to the special facility affected by outage to allow the affected facility to inform carriers of service inadequacies or to change carriers.[65]

43. In its comments, NCS accepts the arrangements and its role under the proposed rule for reporting special facilities outages insofar as they reflect its own current practice and that of the carriers.[66] NCS suggests, however, that the Commission modify proposed Subsections 63.100(e)(2) and (3).[67] NCS asks that Subsection (2) allow an oral report within 120 minutes with a written report to follow the next business day, because sometimes a full written report within 120 minutes will not be feasible.[68] NCS contends that Subsection (3) of the current rule should permit the NCS to edit or hold back final reports, even if initial reports have been forwarded to the Commission, when NS/EP concerns are affected by elements of the final reports.[69] NCS understands that, under the proposed rules, outages affecting nuclear power plants are to be reported through NCS as special facilities outages. NCS disagrees with Pacific's suggestion that a list of or the method of determining special facilities be given to the carriers. Such a list would be unnecessary and would contain classified information.[70] NCS denies the need to provide a report to the affected special facility since the affected facility will be the entity reporting to the NCS and the facility has more information about the outage than the NCS.[71] The NCS, with the assistance of the service provider, currently prepares the initial report to the Commission on the basis of the information provided by the facility. The NCS does not believe that firm rules need to be established to ensure carrier cooperation, since cooperation during

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[63] Pacific reply comments at 4.

[64] AT&T reply comments at 4-5.

[65] UTC comments at 5.

[66] NCS comments at 3.

[67] See Report and Order Appendix A.

[68] NCS comments at 3.

[69] Id. at 4.

[70] NCS reply comments at 3.

[71] Id. at 5.

the voluntary reporting period has been satisfactory.[72]

44. **Special Facilities - (NS/EP) Discussion:** The NCS is comprised of various executive departments and agencies and operates under the direction of the Secretary of Defense to ensure the NS/EP needs of the federal government as well as state and local governments.[73] Whether NS/EP concerns implicated in outages make it inappropriate for outage reports to be received and analyzed as other outage reports is a matter that must be decided on a case by case basis. The suggestions of the NCS for procedures to determine whether outage reports should be submitted to the FCC, where those suggestions are grounded in NS/EP concerns and do not prevent the FCC from fulfilling its duty to ensure network reliability, will, therefore, be adopted.

45. Subsection 63.100(e)(3) will be modified as requested. We reject Pacific's suggestion that a list of or the method for determining special facilities be given to the carriers. Additionally, Subsection 63.100(e)(2) will be modified as requested to provide additional time that may be required for consultations between the NCS, the affected facility and the implicated carrier. NCS, in consultation with the service provider, prepares the initial report to the FCC. Our proposed rules do not explicitly require a written initial report to be prepared by the carrier for submission to the NCS. This accords with present practice and allows time for the accommodation of NS/EP concerns that may otherwise be compromised. To ensure continued cooperation, we will modify the proposed rule to require carriers to consult with the NCS when outages to be reported by the NCS occur on their networks. If the NCS determines that a report to the FCC is appropriate, our proposed rules require the carrier to send to the NCS a written final report containing all information otherwise required in final reports to the FCC. But the proposed rules recognize that additional time may be needed by the NCS to review and edit the information received for inclusion in its final report to the FCC. We agree that it would be useful to specify that carriers are required to submit their final reports to the NCS within 28 days of the outage, leaving the NCS two days to determine the contents of final reports to the FCC. We will adopt the two day deadline because the NCS has not indicated that additional time is needed.

46. Nuclear power plants are special facilities and outages affecting them have significant NS/EP implications. Such outages will, therefore, be reported through the NCS. The determination as to whether an outage affecting telecommunications at a nuclear power plant is mission-affecting and should be reported to the NCS is made, as a matter of present practice, by the Nuclear Regulatory

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[72] Id.

[73] NCS comments at note 1.

Commission. For the reasons stated by NCS and summarized above, there is no need for the NCS to report an outage to the affected special facility.

47. Special Facilities - (TSP) Background: In the Report and Order, the Commission declined to add Telecommunication Service Priority System (TSP)-related information to the reporting requirement.[74] TSP is the system used to authorize common carriers to provide or restore on a priority basis certain services designated as important for reasons of NS/EP.[75] The issue was not revisited either by the NRC or in the Notice in determining which facilities would be designated "special" for purposes of reporting outages.

48. Special Facilities - (TSP) Comments: UTC suggests that the term "special offices and facilities" be defined to include circuits with TSP designations because outages affecting these circuits could have a major impact on the public. UTC contends that reports on outages affecting TSP circuits would provide a more complete reliability picture.[76] UTC suggests that the NCS procedures be applied to TSP-assigned circuit outages. The NCS should relay outage reports to the affected special facility, even if the outage has not been reported to the FCC so that the facility can demand improved service or redundant circuits or opt for a second carrier. The FCC should also adopt a procedure whereby a facility can demand that a carrier file a report to the NCS within 30 days of an outage affecting service to a circuit qualifying for a TSP assignment.[77]

49. Southwestern opposes UTC's suggestion that TSP outages be included in special facilities reporting. Southwestern states that the Commission already rejected a similar suggestion by UTC in the Report and Order and that it would be enormously time consuming to search through the hierarchy from facility level to circuit level to identify the outages that affected TSP circuits.[78] AT&T asserts that the TSP system governs restoration priorities in national emergencies. In non-emergency situations the failure of an individual TSP circuit does not indicate that anything of public importance has occurred or even that users lack any communications capabilities.[79] Pacific also disagrees with UTC's proposal that TSP

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[74] Report and Order at para. 29.

[75] See 47 C.F.R. Section 64.401.

[76] UTC comments at 4.

[77] Id. at 6.

[78] Southwestern reply comments at 3.

[79] AT&T reply comments 5-6.

circuits be included as special facilities, since minor outages on these circuits have no effect on national network reliability and significant TSP outages will be reported under the thresholds.[80] MCI states that there are many TSP circuits not serving special facilities and that additional NCS follow up of TSP-affecting outages is unnecessary.[81] NYNEX states that present TSP reporting procedures capture all needed information.[82] NCS claims that public reports of TSP circuit outages could jeopardize the national interest.[83] BellSouth points out that TSP circuits already have priority treatment and are routinely provisioned with backup facilities. Outage events affecting them are already subject to review by the TSP Oversight Committee which reports to the Commission and the NCS.[84]

50. Special Facilities - (TSP) Discussion: None of the reasons offered by UTC justifies adding significantly to the reporting burdens of either the carriers or the NCS. Requiring reports of TSP-qualified circuit failures would substantially increase the costs of the TSP system. In the Report and Order, we rejected UTC's suggestion because of the costs of reporting actual TSP failures. The NCS is closely involved in the administration of the TSP system that is intended to provide for NS/EP telecommunications needs.[85] For these reasons, we are especially concerned that in the view of NCS the public reporting of TSP circuit failures could jeopardize the national interest. We continue to believe, as we indicated in the Report and Order, that the better course is to leave the matter to the TSP System Oversight Committee[86] for any necessary changes.[87]

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[80] Pacific reply comments at 5.

[81] MCI reply comments at 2.

[82] NYNEX reply comments at 10.

[83] NCS reply comments at 4. NCS has revised its opinion, stated in the Report and Order at para. 28, that FCC outage reports should track the effectiveness of the TSP system. NCS reasons that the procedures addressing NS/EP matters recommended by the NRC, incorporated in our proposed rules and adopted here sufficiently address the concerns NCS expressed in the Report and Order.

[84] BellSouth reply comments at 4.

[85] See 47 C.F.R. Part 64, Appendix A.

[86] The TSP System Oversight Committee is a committee established and assisted by the Executive Office of the President to identify and review any problems developing in the TSP System. See Appendix A to Part 64 of the rules at Section 6(b)(2)(j).

51. **Reporting of Fire-related Incidents - Background:** The Notice did not propose adoption of the NRC Fire Prevention Focus Team's recommendation that all fire-related incidents that affect service to 100 or more service lines for a period of 30 minutes or longer be reported within twenty four hours to ATIS for study. Instead, the Notice proposed a modified version of the Team's recommendation. The suggested changes include requirements that carriers experiencing such outages notify the Commission and file the initial report within three days.

52. **Reporting of Fire-related Incidents - Comments:** Numerous commenters oppose the proposed requirement. Ameritech and Pacific state that individual fire-related incidents should only be reported to ATIS, as recommended by the Fire Prevention Focus Team. They claim that the periodic analyses that ATIS would be required to forward to the Commission will be adequate to serve the Commission's needs and that significant fire-related outages will be reported in any event directly to the Commission under the numerical reporting thresholds.[88] Pacific states that if ATIS analyses show a need for reports to be submitted directly to the Commission, the Commission can revisit the issue.[89] AT&T agrees with the Fire Team's recommendation, stating that the Commission must not overburden itself or industry by micromanaging.[90] AT&T argues that the numerous comments opposing the reporting of fire-related incidents show that various issues need to be resolved before a practical and useful reporting requirement can be adopted. AT&T suggests that the Network Reliability Steering Committee study the issues and develop appropriate limitations on the scope of fire-reporting. In the meantime, AT&T argues that the NRC recommendation for reporting to ATIS should be adopted.[91] Bell Atlantic and BellSouth agree that the Fire Team's recommendation should be followed because ATIS is in the best position to analyze the information received in fire-related reports.[92] NYNEX agrees that an initial fire-incident report should be submitted to ATIS but suggests that final reports should be sent by the carrier to the Commission and should reflect ATIS' analysis.[93] In its reply

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[87] Report and Order at 29.

[88] Pacific comments at 10; Ameritech reply comments at 2.

[89] Pacific comments at 11.

[90] AT&T comments at 5.

[91] AT&T reply comments at 2-3.

[92] Bell Atlantic reply comments at 4; BellSouth reply comments at 3.

[93] NYNEX comments at 18.

comments, NYNEX argues, instead, that the Fire Team's recommendation is preferable because ATIS is better able to handle the administrative burden than the Commission and because avoiding the appearance of the incident on the public record will prevent unjustified reliability concerns and encourage the free flow of ideas.[94] MCI states that the industry is already voluntarily reporting fire-related incidents to ATIS and a requirement to that effect would be superfluous.[95]

53. Bell Atlantic also objects that the NRC's definition of "fire-related incident" is overly broad in that it would include short circuits that caused some smoke as well as small outages caused by fires entirely outside carrier control in adjacent property. Such reports would not meaningfully contribute to determining the role that fires play in network outages but would prove burdensome, and the explanations of a fire's cause would often be secondhand. Bell Atlantic suggests defining "fire-related incident" to include only outages in which visible flames in a central office or controlled environmental vault are the root cause or triggering event leading to the outage.[96] Sprint states that under the present definition the number of outage reports received by the Commission would be drastically increased and suggests that the issue of a narrower definition for reporting fires to the Commission be referred to an industry group. Sprint would redefine "fire-related incident" to include only fires at central offices, POPs, regenerator sites, satellite earth stations and other network "nodes."[97] BellSouth and GSA would include, in a similar redefinition, fires occurring in central offices, repeater stations and controlled environmental vaults and exclude reports of damage to external equipment by fires the prevention of which is not within the control of the carrier.[98] Southwestern Bell would include tandems in the list of facilities covered by the rule.[99]

54. US West would require reports of fire-related incidents only in switching and interoffice facilities, since fires external to such facilities may often not be technically or economically preventable.[100] Rochester suggests reporting only fire-related

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[94] NYNEX reply comments at 9.

[95] MCI reply comments at 10.

[96] Bell Atlantic comments at 10.

[97] Sprint comments at 6-7.

[98] BellSouth comments at 4; GSA reply comments at 6.

[99] Southwestern Bell at 1-2.

[100] US West comments at 4.

incidents affecting 10,000 lines and occurring in central offices, repeater stations, controlled environmental vaults and similar facilities, so that only information about fires that affect service significantly is generated. BellSouth contends, along with NYNEX, that, since virtually all fire-related incidents will affect at least 100 lines, this 100-line nominal threshold can be dropped from the rule for administrative simplicity.[101] NYNEX acknowledges that fire reporting under the rule as presently proposed will cover areas over which carriers have no control, but states that the data the reports provide will be of value because network equipment resides on customer locations and trends that develop with regard to this equipment's reliability should be known. NYNEX also believes that smoke incidents can produce acid that affects reliability, so that limiting reporting to visible flames as Bell Atlantic suggests is not advisable.[102]

55. **Reporting of Fire-related Incidents** - **Discussion:** In its final recommendations to the Commission, the NRC's Fire Prevention Team determined that, although fire-related outages rarely occur, "on those few occasions when a fire has struck a critical communications facility, the result has been devastating." The Team also estimated that service-affecting fires could be reduced by as much as 25%, depending upon the information received under its reporting recommendation.[103] The Team also estimated that 20 to 30 service-affecting fire-related outages per year would be reported to ATIS under its recommended reporting standard.[104] Only the accuracy of the last of these statements is disputed in the comments.

56. We note that since the beginning of voluntary reporting at the 30,000-affected customers threshold only three fire-related incidents have been reported, but those incidents potentially affected nearly a million customers.[105] We believe that, in view of the absence of significant and varied fire-related data at the 30,000 customer threshold level and the potential seriousness of fire-related incidents when they do occur, a much lower threshold for reporting fire-related incidents is necessary. We agree that, even if this standard results in reports of incidents over which carriers have no control, data provided in such reports may be of

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[101] BellSouth comments at 4; NYNEX reply comments at 7.

[102] Id. at 7.

[103] Report to the Nation, Section G, p. 28.

[104] Id. at p. 27.

[105] See Reports of August 31, 1993, September 26, 1993 and March 15, 1994 outages, available at FCC offices in room 6010, 2025 M Street, N.W., Washington, D.C. 20554

value because network equipment resides on customer locations and this equipment's reliability should be known.

57. We also note that smoke damage associated with fire in central offices is more severe than thermal damage in most instances.[106] We believe, however, that the suggestions for limiting the number of reportable incidents have merit. We agree that use of a legally mandated 100-lines threshold may lead to an inordinate number of unnecessary reports.

58. Therefore, we will modify the requirement for reporting fire-related incidents to include only those that affect 1,000 or more lines and otherwise adopt the rule as proposed. Specifically, we will require that all fire-related incidents that affect fewer than 50,000 customers but at least 1000 or more lines be reported to the Commission within 3 days, with final reports due in 30 days. We do not intend by this rule that the industry abandon the Fire Prevention Focus Team's recommendation for voluntary reporting of fire-related events to ATIS, with periodic analyses forwarded to the FCC. Rather, we expect our fire reporting rule will facilitate analyses by ATIS.

59. **Contents of Reports - Background:** The Notice proposed that each final outage report to the Commission specifically detail the root cause of the outage and list and evaluate the effectiveness and application in the immediate case of any best practices or industry standards identified by the Council as helpful in eliminating or ameliorating outages of the reported type.

60. **Contents of Reports - Comments:** Sprint states that in some instances a root cause analysis may take longer than thirty days, especially if tests performed by outside vendors are necessary. Sprint proposes that carriers be allowed to file supplementary reports after the thirty day limit when necessary to complete the investigation of root causes.[107] Most other commenters supported the root cause reporting requirement without modification.[108] Many commenters, however, state that best practice analysis should not be required. NYNEX points out that there are 277 NRC best practices and claims that their use does not really measure a carrier's commitment to providing reliable service, especially since technology may make the current best practices obsolete.[109] NYNEX feels that carriers should not have to explain why they did not follow a practice because business judgements involving risk

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[106] Report to the Nation, Section G, page 15-19.

[107] Sprint comments at 7.

[108] See, e.g., GSA comments at 6.

[109] NYNEX comments at 10-12.

assessments and cost comparisons made prior to an outage may be subject to unfair criticism in hindsight.[110] NYNEX claims that the factual analysis in reports will adequately allow for an assessment of reliability trends without best practice discussion.[111] Southwestern Bell and BellSouth ask the Commission to state on the record that a failure to follow a voluntary industry practice or standard need not be discussed in final outage reports.[112] Ameritech and US West, citing specific examples, claim that the cost of employing best practices in many cases may constitute "gold-plating." US West contends that if carriers are to report best practices, they should be allowed to show that in particular circumstances the costs of a best practice outweigh the benefits.[113] TCG claims that both root cause analysis and analysis of relevant best practices in public documents could prove harmful to competition or even be used by terrorists.[114]

61. TCA, GSA and UTC agree with the proposed best practices reporting requirement, claiming that these analyses will allow the Commission to identify and promote development of solutions for recurring problems.[115] TCA points out that inclusion of best practices analysis does not impose absolute requirements on carriers. TCA claims that best practice analysis would not be a burden in the case of a reliable carrier because there would be few outage reports, and in the case of a unreliable carrier with many outage reports the absence of best practice procedures should be explained.[116]

62. **Contents of Reports** - **Discussion:** We believe the public interest in avoiding or mitigating the effects of telephone service outages is best served by adopting the root cause and best practices analysis modifications to our rules. However, we agree that carriers should be allowed to file supplementary reports after the thirty day limit when necessary to identify root causes. This

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[110] BellSouth reply comments at 6.

[111] NYNEX reply comments at 11; see also BellSouth reply comments at 6.

[112] BellSouth reply comments at 5; Southwestern Bell comments at 5.

[113] Ameritech reply comments at 3; US West comments at 7.

[114] TCG comments at 3-4.

[115] GSA comments at 8; UTC comments at 6; TCA reply comments at 2.

[116] TCA reply comments at 3-4.

does not affect our requirement that "all available information," will be included in the 30 day reports.[117]

63. While we understand that a carrier's adoption of the NRC's best practices will not enhance reliability in all circumstances, they do represent the consensus of the industry regarding the best procedures to follow in a wide variety of outages. Where a carrier has not implemented a seemingly applicable best practice, the Commission recognizes that the carrier may, nevertheless, have acted reasonably and that the implementation of best practices may be subject to economic constraints. Our interest in knowing the carrier's reasons for not employing industry best practices does not constitute an accusation. We believe, however, that best practice identification and analysis strongly encourages carriers and their on-location technical personnel to become familiar with and implement those practices that are appropriate. Reports containing such identification and analyses will allow the Commission and the telecommunications industry to monitor the success of the NRC's recommendations and assess the need for modifications and further recommendations. Finally, the Commission's confidentiality rules[118] and the procedure discussed above for reporting outages involving NS/EP will protect against the dangers of disclosure mentioned by TCG. We will, therefore, adopt the proposed requirements that carriers in their final reports identify their use of or failure to use best practices with respect to the facilities or procedures identified in their reports as the cause of an outage. Carriers should analyze the effectiveness of any best practices relevant to the reported outage.

64. **Thresholds/Best Practices as Standards - Background:** Although the Notice did not propose using either the number of reported outages or best practice implementation as standards for assessing penalties for poor carrier reliability, it did reserve the right to take any action within the Commission's authority to ensure efficient telecommunications service and indicated that additional

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[117] The phrase "all available information" has been variously interpreted by different carriers. Some final reports received by the Commission include intermediate times of partial service restoration; others indicate only the time when full service capacity is restored. Where such intermediate restoral times are available, they should be included in final reports. Carriers should include in final reports the times, if known, when 25%, 50%, 75% and 100% of disrupted traffic is restored through alternate routing or physical repair. Carriers should also state, in their description of the type of equipment involved, the manufacturer and, if applicable, the software generic.

[118] See 47 C.F.R. Section 0.459.

rulemakings were likely if it appeared that carriers were not observing appropriate best practices.

65. **Thresholds/Best Practices as Standards - Comments:** All parties who addressed the issue opposed present use of either the numerical thresholds or best practices as standards for assessing penalties. AT&T claims that using reporting thresholds as a basis for levying forfeitures would discourage reporting, as noted in the Report to the Nation.[119] AT&T states that the Commission already has sufficient enforcement authority to deal with unacceptable levels of service quality. Ameritech argues that best practices were intended to stimulate creativity in carrier determinations about reliability, not to be made mandatory, and that the Commission should not readily conclude that failure to follow a best practice constitutes a case of malfeasance.[120] BellSouth claims that use of best practices as de facto legal standards will prevent the industry from reaching consensus about them in the future.[121] US West and Pacific argue that best practices should not be mandated because carriers must have flexibility in responding to reliability concerns.[122]

66. Sprint agrees and states that due process requires the Commission to undertake a rulemaking to establish clear rules and definite standards before enforcement actions are taken against carriers for inadequate reliability performance.[123] Rochester states that use of best practices as standards for forfeitures would only lead to accusations among carriers, vendors, contractors and manufacturers as parties attempted to exculpate themselves and that many reported outages under the proposed rule will be minor and could not fairly be used to show that a carrier was providing unsafe or inadequate services even where best practices were not followed.[124] Southwestern Bell asks the Commission to clarify that a failure to follow a voluntary industry practice or standard does not impose liability.[125]

67. TCA, while agreeing that minimum performance levels are not

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[119] AT&T comments at 7-8, referring to Report to the Nation, TRG Report, Section I, p. 12.

[120] Ameritech reply comments at 2.

[121] BellSouth reply comments at 6.

[122] US West comments at 8; Pacific reply comments at 7.

[123] Sprint comments at 5.

[124] Rochester reply comments at 3-5.

[125] Southwestern Bell comments 3-5.

presently warranted, asserts that the Commission should monitor reports to identify carriers with inferior reliability records or carriers who do not observe best practices and take remedial action including adoption of enforcement orders against particular carriers. If general network reliability concerns increase, the Commission should then initiate a rulemaking to develop mandatory minimum standards.[126]

68. **Thresholds/Best Practices as Standards - Discussion:** One reason for including best practice analysis in our reporting requirement, as indicated above, is to assist the Commission and the industry in investigating the effectiveness of the best practices recommended by the NRC. While we do not adopt best practices identified by the NRC as legal requirements at this time, we expect that carriers will continue to implement rapidly the NRC's best practices, recognizing that particular circumstances must be taken into account. It is premature at this time to determine whether and how we might require reliability measures to be taken by an individual carrier with an inferior reliability record. As we stated in the Notice, however, we reserve the right to take any action within our authority to ensure efficient telecommunications service.[127] We recognize, as stated above, that the NRC's best practices are not a uniformly appropriate set of instructions for enhancing reliability in all circumstances. Nonetheless, we emphasize that we are prepared, if necessary, to propose additional regulations to ensure reliability.

69. **Mandatory Mutual Aid - Background:** The NRC's Mutual Aid and Restoration Focus Team developed a compendium, described in the Notice,[128] that outlined the various types of agreements, both formal and informal, that exist for mutual aid among carriers, other industry members and customers. The Team's report also discussed the advantages and disadvantages of each of the various types of agreements according to different circumstances, provided contact lists, considered strategies for public education on finding alternative service during an outage, and suggested other ways to facilitate mutual aid when called for. This document is periodically updated by the National Communications System.

70. **Mandatory Mutual Aid - Comments:** TCA proposes that the Commission seek comment on mutual aid and restoration requirements. TCA states that the ability to minimize the effect of outages through mutual aid between carriers and vendors increases as the number of providers increases but rivalry may prevent full cooperation. Alternatively, TCA asks the Commission to specify

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[126] TCA comments at 6.

[127] Notice at para. 21.

[128] Notice n. 10.

that it is an unreasonable practice in violation of 201(b) of the Act not to participate in mutual aid and restoration agreements. TCA also suggests that the Commission establish a deadline for carriers to certify that they have taken such steps.[129]

71. AT&T, Southwestern Bell and BellSouth disagree, arguing that mutual aid agreements should be left to the private efforts of carriers, and declaring that present voluntary cooperation during emergencies is excellent, as shown by the report of the NRC's Mutual Aid Focus Team.[130] Pacific argues that there is no need for the Commission to declare that failure to enter into specified types of agreements is a violation of Section 201(b) of the Act. Pacific contends that the Network Operations Forum (NOF) of ATIS has provided a comprehensive framework for mutual aid and restoration, including information sharing guidelines, software validation guidelines, Signalling System 7 (SS7) baseline security guidelines, database maintenance, power routines, link diversity validation, emergency communication, and planned network maintenance notification.[131] MCI states that TCA's proposal for requiring mutual aid would deny carriers necessary flexibility.[132]

72. **Mandatory Mutual Aid - Discussion:** Carriers have consistently maintained, both in this record and in proceedings of the Network Reliability Council, that a strong spirit of cooperation, evidenced by formal and informal mutual aid arrangements, exists throughout the industry. After studying the full variety of telecommunications mutual aid arrangements, the NRC Mutual Aid and Restoration Team determined that there was extensive vendor-with-carrier and carrier-with-carrier cooperation both prior to and during emergencies and that "commitment to prompt notification, cooperative interaction and the provision of technical and material assistance during emergencies is general throughout the industry."[133] We have found no evidence to the contrary. Although virtually all aspects of telecommunications service and equipment provision are becoming more competitive, the evidence before us suggests that

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[129] TCA comments at 7.

[130] BellSouth reply comments at 5; Southwestern Bell reply comments at 4 and AT&T reply comments at 7, referring to Report to the Nation, Section H, page 17 and the Report and Order at para. 16 (where the Commission indicated that the NOF was the proper forum for solving carrier cooperation issues.)

[131] Pacific reply comments at 7-8.

[132] MCI reply comments at 9.

[133] Mutual Aid and Restoration Compendium, Report to the Nation, Section H, page 17.

carriers provide assistance to each other when requested to do so. This assistance has taken different forms.[134] Major interexchange carriers experiencing significant service disruptions have assisted customers in obtaining access to other interexchange carriers, and have informed each other that they are doing so. The Commission publishes consumer bulletins that inform customers how to access different interexchange carriers. Finally, carriers have begun to implement a number of the measures proposed by TCA. The Regional Bell Operating Companies, Cincinnati Bell Telephone Company, Southern New England Telephone Company, the GTE Telephone Operating Companies, Sprint/United Telephone Companies, and Bellcore NS/EP recently have entered into the Local Exchange Carrier Mutual Aid Agreement. The carriers provide more than 92 percent of the access lines in the United States. The agreement is designed to resolve, in advance, issues relating to the sharing of equipment, people, supplies, and network capacity among carriers in times of emergency.

73. Because we are aware of no incidents of carriers refusing cooperation, we see no need at this time to mandate mutual aid agreements or to specify the circumstances in which a refusal of aid would be unreasonable. We believe such determinations should be made on the basis of a complete record developed through a complaint filed pursuant to Section 208 of the Act. We understand that current carrier practice is to provide assistance when requested; that understanding will be our point of departure in considering any such complaint.

74. **IITP Financing - Background:** Following the September 12, 1991 inter-industry meeting on network reliability hosted by the Commission, the Internetwork Interoperability Test Plan Ad Hoc Committee was established by the Network Operations Forum of the Alliance for Telecommunications Industry Solutions and is administered by Bellcore. The Committee has developed interoperability internetwork test scripts and interconnected multiple carrier and supplier laboratories to cooperatively execute those test scripts. The recommendations of the NRC's SS7 Focus Team, summarized for comment in the Notice, stated that "there must be increased commitment of personnel and resources across the

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[134] See Minutes of September 30, 1992 NRC meeting for reports on mutual aid measures taken during Hurricane Andrew, which hit Florida on August 24, 1992, and Louisiana a day later, and Hurricane Iniki which struck Hawaii on September 14, 1992; see Minutes of December 15, 1992 NRC meeting for report of mutual aid measures taken during the flood of October 9, 1992, in Fairfax, South Carolina; see Minutes of March 17, 1993 NRC meeting for report of mutual aid measures taken after the bombing of the World Trade Center on February 26, 1993.

industry for the Internetwork Interoperability Test Plan (IITP)."[135]

75. IITP Financing - Comments: In its comments, Bell Atlantic states that the costs for IITP testing, presently assumed entirely by several LECs, should be shared more generally. It asks the Commission to provide an industry-wide mechanism such as that established by the NRC for funding the NRC Symposium or the ATIS Steering Committee to do this.[136] BellSouth agrees.[137] Pacific agrees that costs for IITP testing should be shared more equitably across the industry, but believes, along with AT&T, that funding can be resolved within the industry and that no Commission action is necessary.[138] MCI argues that industry-wide funding for IITP is not necessary for fairness reasons, since LECs recover their IITP costs through the interexchange access rates and says that the costs of industry-wide funding would greatly exceed benefits.[139]

76. IITP Financing - Discussion: In its recommendation to the Commission, the NRC's SS7 Focus Team stated that an unfair placement of the burden for IITP on a small number of LECs "has complicated and delayed the scheduling and execution of tests."[140] This is of serious concern. The IITP was proposed as a response to concerns that interconnected signalling networks using different equipment and rapidly evolving software may be more vulnerable to telephone service outages due to unexpected interactions. The IITP provides the ability to test different networks using different equipment, lowering the risk of unintended interactions. In addition to prophylactic applications, the IITP can be used after an event to diagnose an incident. For example, the IITP was used to diagnose a service outage caused by switches of different manufacture interpreting a remote make-busy feature in different ways. The feature that caused the outage has been modified to resolve the immediate problem, but the incident illustrates the point that unintended, service disabling events are possible in an environment in which multiple service and equipment providers are attempting to meet a broad range of customer service requirements. The IITP provides a way to minimize these risks.

77. We agree with Pacific and AT&T that the funding problem should be resolved within the industry. The NRC is the best

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[135] Notice at para 12.

[136] Bell Atlantic comments at 11.

[137] BellSouth reply comments at 6.

[138] AT&T reply comments 6-7; Pacific reply comments at 6.

[139] MCI reply comments at 8-9.

[140] Report to the Nation, Section B, page 46.

mechanism for resolving any IITP funding problem that may exist, either by means of specific recommendations to the industry or, if such a solution is not possible, by means of a recommendation to the FCC. We refer this question to the NRC.

78. Confidentiality - Background and Comments: In the Notice, the Commission indicated that it would continue to follow the procedures set forth in Section 0.459 of the Rules, 47 C.F.R. § 0.459, in deciding requests for confidentiality for material in outage reports and that it does not anticipate, as a general matter, that carriers will be able to demonstrate a basis for keeping outage reports confidential.[141] NYNEX asks the Commission to clarify that no presumption against a legitimate request will exist. TCG agrees with NYNEX, stating that public disclosure of certain kinds of network information could prove harmful to competition and would inhibit carriers from providing detailed information.[142] Sprint states that as long as the Commission's procedures for confidentiality in Section 0.459 of the Rules are available, outage reports can be given public treatment.[143]

79. Confidentiality - Discussion: We did not intend in the Notice to modify our interpretation of or to provide for a unique application of our confidentiality rules in cases where carriers request confidentiality for outage reports. We have had very few such requests and see no reason that such requests should become more common under the amendments established in the present order. We will continue to apply Section 0.459 as we have in the past.

80. CAP Reporting - Background, Comments and Discussion: All who offered comments on the issue approved our decision, in the reconsideration portion of the Notice, to include CAPs in the reporting requirement.[144] USTA, however, requests that the text of our proposed rules clearly reflect the Commission's decision to require CAPs to report outages.[145] There was no opposition in the reply comments to this request. In the interests of making our rules clear, we will add the phrase "or competitive access provider" to the text of the rules to show clearly that such carriers are included in the reporting requirements. As an additional editorial change to clarify reporting requirements, we will specifically state that an outage includes not only a failure

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[141] Notice at para. 20.

[142] TCG comments at 3.

[143] Sprint comments at 8.

[144] See, e.g., TCG comments at 2 and Rochester reply comments at 2.

[145] USTA comments at 1-2.

of the carrier's network, but also a degradation in the performance of the network where a customer's ability to establish or maintain a channel of communications is compromised.

81. Lessee Reporting - Background and Comments: The proposed rules would require common carrier lessees, as well as owners and operators, of facilities in which an outage occurs to report outages.[146] AT&T states that lessees should not be required to report outages because the owner or operator of affected facilities is in the best position to determine root cause, analyze best practices and mitigate outages. AT&T argues that lessee reporting would cause confusion, leaving some outages unreported and causing duplicate reporting of others. AT&T states that the lessee must already notify the owner or operator of facilities affected by an outage and provide assistance in completing reports.[147]

82. Lessee Reporting - Discussion: We agree that some duplication of reports will occur as a result of our inclusion of lessees in the reporting requirement. We see no reason, however, to conclude that other outages would go unreported. Under the present rules, which do not mention lessees, some outages have been reported late and some may have gone unreported by reason of differing understandings between facilities owners and lessees as to the application of the requirement. Occasional duplicate outage reports from different carriers involved in the same outage does not seem to be a burden. Therefore, we will include lessees in our reporting requirement.

83. Reporting to Affected Parties - Background, Comments and Discussion: The Notice proposed to require the submission of outage reports only to the FCC. NYC, however, suggests that "regulators and other interested parties must be apprised immediately of major service disruptions" because, for some businesses, even short disruptions can be severely damaging.[148] Requiring carriers to report outages to affected parties such as businesses could produce insurmountable difficulties in many cases. State regulators, of course, who wish to be apprised of outages within their jurisdictions may establish such requirements themselves. We refer to the Council the issue of whether there are any affected parties other than 911 PSAP officials who may need to be separately notified of outage conditions, and, if so, how that notice should be made.

IV. CONCLUSION

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[146] Notice at Appendix A.

[147] AT&T comments at 8.

[148] NYC comments at 5.

84. Consistent with the Commission's objective to encourage the development of a competitive, innovative and excellent American communications system and in response to the recommendations submitted by the Network Reliability Council to the Commission, we are today amending Section 63.100 of our Rules to require reporting of: 1) outages potentially affecting 30,000 or more customers and lasting 30 or more minutes; 2) outages lasting 30 or more minutes and affecting certain special facilities regardless of the number of customers affected; and 3) fire-related incidents affecting 1000 or more lines and continuing for 30 or more minutes. We are requiring carriers to include in their outage reports an analysis of the root cause of the incident and evaluate the effectiveness and application of best practices identified by the Council. We also amend the time in which outages affecting 50,000 or more customers are initially reported to the Commission. In addition, we are requiring carriers to notify the management of any 911 facilities affected by a reportable outage. We are amending certain language of Section 63.100 to make clear that competitive access providers are to report outages, as provided in the Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, released December 1, 1993 in this Docket. The information we receive will facilitate our monitoring of the quality of service being provided and enable us to take swift remedial action as required. Finally, we are asking the Network Reliability Council to collect and analyze data and report to the Commission on: 1) whether special facilities outage reporting should be expanded to include satellite, cellular, and other wireless carriers; 2) whether and how a funding structure for the Internetwork Interoperability Test Plan should be designed and; 3) whether and how customers of carriers should be informed of service outages.

V. ORDERING CLAUSES

85. Accordingly, pursuant to Sections 1, 4(i), and 201 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 151, 154 and 201, Section 63.100 of the Commission's Rules, 47 C.F.R. § 63.100, IS AMENDED as set forth in the Appendix hereof, effective 30 days after publication in the Federal Register.[149]

86. It is Further Ordered, that, the Secretary shall cause a summary of this Order to be published in the Federal Register which shall include a statement describing how members of the public may obtain the complete text of this Commission decision. The Secretary shall also provide a copy of this Order to each state utility commission.

FEDERAL COMMUNICATIONS COMMISSION

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[149] Carriers are, of course, free to begin complying immediately.

William F. Caton
Acting Secretary

APPENDIX

Part 63 of the Commission's Rules and Regulations (chapter 1 of title 47 of the Code of Federal regulations, Part 63) is amended as follows:

1. The authority citation for part 63 remains as follows:

AUTHORITY: Sections 1, 4(i), 4(j), 201-205, 218 and 403 of the Communications Act of 1934, as amended, 47 U.S.C. Secs. 151, 154(i), 154(j), 201-205, 218, and 403, unless otherwise noted.

2. §63.100 is amended by deleting the present §63.100 in its entirety and substituting the following:

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§ 63.100 NOTIFICATION OF SERVICE OUTAGE

(a) As used in this section:

(1) "outage" is defined as a significant degradation in the ability of a customer to establish and maintain a channel of communications as a result of failure or degradation in the performance of a carrier's network.

(2) "customer" is defined as a user purchasing telecommunications service from a common carrier.

(3) "special offices and facilities" are defined as major airports, major military installations, key government facilities, nuclear power plants and 911 public service answering points (PSAPs).

(4) An outage which "potentially affects" a 911 "special facility" is defined as an outage which disrupts more than 25% of the lines to any PSAP without providing automatic rerouting to an alternative PSAP.

(5) "major airports" are defined as those airports described by the Federal Aviation Administration as large or medium hubs. The member agencies of the National Communications System (NCS) will determine which of their locations are "major military installations" and "key government facilities."

(6) An outage which "potentially affects" a major airport is defined as an outage that disrupts 50% or more of the air traffic control links or other FAA communications links to any major airport, any outage that has caused an ARTCC or major airport to

lose its radar, any ARTCC or major airport outage that is likely to be of media interest, any outage that causes a loss of both primary and backup facilities at any ARTCC or major airport, and any outage to an ARTCC or major airport that is deemed important by the FAA as indicated by FAA inquiry to the carrier management personnel.

(7) A "mission-affecting" outage is defined as an outage that is deemed critical to national security/emergency preparedness (NS/EP) operations of the affected facility by the National Communications System member agency operating the affected facility.

(b) Any local exchange or interexchange common carrier or competitive access provider that operates transmission or switching facilities and provides access service or interstate or international telecommunications service, that experiences an outage which potentially affects 50,000 or more of its customers on any facilities which it owns, operates or leases, must notify the Commission if such outage continues for 30 or more minutes. Satellite carriers and cellular carriers are exempt from this reporting requirement. Notification must be served on the Commission's Monitoring Watch Officer, on duty 24 hours a day in the FCC headquarters building in Washington, D.C., or on a secondary basis it may be served on the Commission's Watch Officer on duty at the FCC's facility at Grand Island, Nebraska. The notification must be by facsimile or other record means delivered within 120 minutes of the carrier's first knowledge that the service outage potentially affects 50,000 or more customers, if the outage continues for 30 or more minutes. Notification shall identify a contact person who can provide further information, the telephone number at which the contact person can be reached, and what information is known at the time about the service outage including: the date and estimated time (local time at the location of the outage) of commencement of the outage; the geographic area affected; the estimated number of customers affected; the types of services affected (e.g. interexchange, local, cellular); the duration of the outage, i.e. time elapsed from the estimated commencement of the outage until restoration of full service; the estimated number of blocked calls during the outage; the apparent or known cause of the incident, including the name and type of equipment involved and the specific part of the network affected; methods used to restore service; and the steps taken to prevent recurrences of the outage. Carriers must indicate, when specifying the types of services affected by any reportable outage, when 911 is one of those services, whether more than 25% of the lines to any PSAP were disrupted and there was no automatic rerouting to an alternate PSAP. The report shall be captioned Initial Service Disruption Report. Lack of any of the above information shall not delay the filing of this report. Not later than thirty days after the outage, the carrier shall file with the Chief, Common Carrier Bureau, a Final Service Disruption Report providing all available information on the service outage, including any information not

contained in its Initial Service Disruption Report and detailing specifically the root cause of the outage and listing and evaluating the effectiveness and application in the immediate case of any best practices or industry standards identified by the Network Reliability Council to eliminate or ameliorate outages of the reported type.

(c) Any local exchange or interexchange common carrier or competitive access provider that operates transmission or switching facilities and provides access service or interstate or international telecommunications service, that experiences an outage which potentially affects at least 30,000 and less than 50,000 of its customers on any facilities which it owns, operates or leases, must notify the Commission if such outage continues for 30 or more minutes. Satellite carriers and cellular carriers are exempt from this reporting requirement. Notification must be served on the Commission's Monitoring Watch Officer, on duty 24 hours a day in the FCC headquarters building in Washington, D.C., or on a secondary basis it may be served on the Commission's Watch Officer on duty at the FCC's facility at Grand Island, Nebraska. The notification must be by facsimile or other record means delivered within 3 days of the carrier's first knowledge that the service outage potentially affects at least 30,000 but less than 50,000 customers, if the outage continues for 30 or more minutes. Notification shall identify the carrier and a contact person who can provide further information, the telephone number at which the contact person can be reached, and what information is known at the time about the service outage including: the date and estimated time (local time at the location of the outage) of commencement of the outage; the geographic area affected; the estimated number of customers affected; the types of services affected (e.g. interexchange, local, cellular); the duration of the outage, i.e. time elapsed from the estimated commencement of the outage until restoration of full service; the estimated number of blocked calls during the outage; the apparent or known cause of the incident, including the name and type of equipment involved and the specific part of the network affected; methods used to restore service; and the steps taken to prevent recurrences of the outage. Carriers must indicate, when specifying the types of services affected by any reportable outage, when 911 is one of those services whether more than 25% of the lines to any PSAP were disrupted and there was no automatic rerouting to an alternate PSAP. The report shall be captioned Initial Service Disruption Report. Lack of any of the above information shall not delay the filing of this report. Not later than thirty days after the outage, the carrier shall file with the Chief, Common Carrier Bureau, a Final Service Disruption Report providing all available information on the service outage, including any information not contained in its Initial Service Disruption Report and detailing specifically the root cause of the outage and listing and evaluating the effectiveness and application in the immediate case of any best practices or industry standards identified by the Network Reliability Council to eliminate or

ameliorate outages of the reported type.

(d) Any local exchange or interexchange carrier or competitive access provider that operates transmission or switching facilities and provides access service or interstate or international telecommunications service that experiences a fire-related incident in any facilities which it owns, operates or leases that impacts 1000 or more service lines must notify the Commission if the incident continues for a period of 30 minutes or longer. Satellite carriers and cellular carriers are exempt from this reporting requirement. Notification must be served on the Commission's Monitoring Watch Officer, on duty 24 hours a day in the FCC headquarters building in Washington, D.C., or on a secondary basis it may be served on the Commission's Watch Officer on duty at the FCC's facility at Grand Island, Nebraska. The notification must be by facsimile or other recorded means delivered within 3 days of the carrier's first knowledge that the incident is fire-related, impacting 1000 or more lines for thirty or more minutes. Notification shall identify the carrier and a contact person who can provide further information, the telephone number at which the contact person can be reached, and what information is known at the time about the service outage including: the date and estimated time (local time at the location of the outage) of commencement of the outage; the geographic area affected; the estimated number of customers affected; the types of services affected (e.g. interexchange, local, cellular); the duration of the outage, i.e. time elapsed from the estimated commencement of the outage until restoration of full service; the estimated number of blocked calls during the outage; the apparent or known cause of the incident, including the name and type of equipment involved and the specific part of the network affected; methods used to restore service; and the steps taken to prevent recurrences of the outage. Carriers must indicate, when specifying the types of services affected by any reportable outage, when 911 is one of those services whether more than 25% of the lines to any PSAP were disrupted and there was no automatic rerouting to an alternate PSAP. The report shall be captioned Initial Service Disruption Report. Lack of any of the above information shall not delay the filing of this report. Not later than thirty days after the incident, the carrier shall file with the Chief, Common Carrier Bureau, a Final Report providing all available information on the incident, including any information not contained in its Initial Report and detailing specifically the root cause of the incident and listing and evaluating the effectiveness and application in the immediate case of any best practices or industry standards identified by the Network Reliability Council to eliminate or ameliorate incidents of the reported type.

(e) Any local exchange or interexchange common carrier or competitive access provider that operates transmission or switching facilities and provides access service or interstate or international telecommunications service, that experiences an

outage on any facilities which it owns, operates or leases which potentially affects special offices and facilities must notify the Commission if such outage continues for 30 or more minutes regardless of the number of customers affected. Satellite carriers and cellular carriers are exempt from this reporting requirement. Notification must be served on the Commission's Monitoring Watch Officer, on duty 24 hours a day in the FCC headquarters building in Washington, D.C., or on a secondary basis it may be served on the Commission's Watch Officer on duty at the FCC's facility at Grand Island, Nebraska. The notification must be by facsimile or other record means delivered within 120 minutes of the carrier's first knowledge that the service outage potentially affects a special facility, if the outage continues for 30 or more minutes. Notification shall identify a contact person who can provide further information, the telephone number at which the contact person can be reached, and what information is known at the time about the service outage including: the date and estimated time (local time at the location of the outage) of commencement of the outage; the geographic area affected; the estimated number of customers affected; the types of services affected (e.g. 911 emergency services, major airports); the duration of the outage, i.e. time elapsed from the estimated commencement of the outage until restoration of full service; the estimated number of blocked calls during the outage; the apparent or known cause of the incident, including the name and type of equipment involved and the specific part of the network affected; methods used to restore service; and the steps taken to prevent recurrences of the outage. Carriers must indicate, when specifying the types of services affected by any reportable outage, when 911 is one of those services whether more than 25% of the lines to any PSAP were disrupted and there was no automatic rerouting to an alternate PSAP. The report shall be captioned Initial Service Disruption Report. Lack of any of the above information shall not delay the filing of this report. Not later than thirty days after the outage, the carrier shall file with the Chief, Common Carrier Bureau, a Final Service Disruption Report providing all available information on the service outage, including any information not contained in its Initial Service Disruption Report and detailing specifically the root cause of the outage and listing and evaluating the effectiveness and application in the immediate case of any best practices or industry standards identified by the Network Reliability Council to eliminate or ameliorate outages of the reported type. Under this rule, carriers are not required to report outages affecting nuclear power plants, major military installations and key government facilities to the Commission. Reports at these facilities will be made according to the following procedures:

(1) When there is a mission-affecting outage, the affected facility will report the outage to the National Communications System (NCS) and call the service provider in order to determine if the outage is expected to last 30 minutes. If the outage is not

expected to, and does not, last 30 minutes, it will not be reported to the FCC. If it is expected to last 30 minutes or does last 30 minutes, the NCS, on the advice of the affected special facility, will either:

(A) forward a report of the outage to the Commission, supplying the information for initial reports affecting special facilities specified in this section of the Commission's Rules;

(B) forward a report of the outage to the Commission, designating the outage as one affecting "special" facilities," but reporting it at a level of detail that precludes identification of the particular facility involved; or

(C) hold the report at the NCS due to the critical nature of the application.

(2) If there is to be a report to the Commission, a written or oral report will be given by the NCS within 120 minutes of an outage to the Commission's Monitoring Watch Officer, on duty 24 hours a day in the FCC headquarters building in Washington, D.C., or on a secondary basis it may be served on the Commission's Watch Officer on duty at the FCC's facility at Grand Island, Nebraska. If the report is oral, it is to be followed by a written report the next business day. Those carriers whose service failures are in any way responsible for the outage must consult with NCS upon its request for information.

(3) If there is to be a report to the Commission, the service provider will provide a written report to the NCS, supplying the information for final reports for special facilities required by this section of the Commission's rules. The service provider's final report to the NCS will be filed within 28 days after the outage, allowing the NCS to then file the report with the Commission within 30 days after the outage. If the outage is reportable as described above, and the NCS determines that the final report can be presented to the Commission without jeopardizing matters of national security or emergency preparedness, the NCS will forward the report as provided in either (e)(1)(A) or (e)(1)(B) of this section to the Commission.

(f) If an outage is determined to have affected a 911 facility so as to be reportable as a special facilities outage, the carrier whose duty it is to report the outage to the FCC shall as soon as possible by telephone or other electronic means notify any official who has been designated by the management of the affected 911 facility as the official to be contacted by the carrier in case of a telecommunications outage at that facility. The carrier shall convey all available information to the designated official that will be useful to the management of the affected facility in mitigating the affects of the outage on callers to that facility.

(g) In the case of LEC end offices, carriers will use the number of lines terminating at the office for determining whether the criteria for reporting an outage has been reached. In the case of IXC or LEC tandem facilities, carriers must, if technically possible, use real-time blocked calls to determine whether criteria for reporting an outage have been reached. Carriers must report IXC and LEC tandem outages where more than 150,000 calls are blocked during a period of 30 or more minutes for purposes of complying with the required 50,000 potentially affected customers threshold and must report such outages where more than 90,000 calls are blocked during a period of 30 or more minutes for purposes of complying with the 30,000 potentially affected customers threshold. Carriers may use historical data to estimate blocked calls when required real-time blocked call counts are not possible. When using historical data, carriers must report incidents where more than 50,000 calls are blocked during a period of 30 or more minutes for purposes of complying with the required 50,000 potentially affected customers threshold and must report incidents where more than 30,000 calls are blocked during a period of 30 or more minutes for purposes of complying with the 30,000 potentially affected customers threshold.

SEPARATE STATEMENT
OF
COMMISSIONER ANDREW C. BARRETT

In Re: Amendment of Part 63 of the Commission's Rules to Provide for Notification by Common Carriers of Service Disruptions. [Docket No. 91-273]

This Second Report and Order amends the Commission's rules to expand the present telephone service outage reporting requirements. In particular, the revised reporting requirements reduces the threshold requirement for reporting telephone service outages from 50,000 to 30,000 customers and requires notice of all outages affecting "special offices and facilities" regardless of the number of customers affected. Through this Second Report and Order, we adopt most of the reporting recommendations of the Network Reliability Council, although the provisions modify the Council's recommendations in certain respects.

I have previously expressed interest in lower reporting thresholds, including those thresholds for reporting outages affecting threats to public safety such as 911 services or telephone related services at major airports.[1] I recognize the need for simplicity and accuracy in estimating the number of customers potentially affected by an outage. Lowering reporting thresholds to 30,000 will more reliably track emergency outage incidents without overburdening the Commission or the industry. In addition, the revised reporting requirements account for the critical safety situations where outages should be reported, regardless of the number of customers affected. When dealing with 911 emergency services and major airports, safety is our primary concern. Therefore, in order to ensure that these safety concerns are adequately addressed, this order requires that outages affecting "special offices and facilities" be reported in all cases.[2]

I recognize that the goals of the Commission concerning these outage reports are to become informed quickly of serious disruptions and to gather, analyze and share information useful to ensure network reliability. I suggest, however, that this data should be used to identify areas where most outages occur, as well as the causes of the outages in those areas, in order for the Commission and Network Reliability Council to report findings in this area.

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[1]See Separate Statement's of Commissioner Andrew C. Barrett, February 13, 1992 and November 10, 1993 [CC Docket 91-273].

[2]"Special offices and facilities" include 911 tandems and major airports as well as major military installations, key government facilities, and nuclear power plants. It is also noted that this Order sets the threshold for required reports of fire related incidents in carrier equipment to those incidents affecting 1,000 or more service lines.

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